

FY2018 Michigan PWSS Program Operator Certification Work Plan Summary October 1, 2017 to September 30, 2018 Federal funding used: PWSS grant, DWSRF set-asides	
State Contact	Koren Carpenter, carpenterk5@michigan.gov , (517) 284-6857
EPA Region 5 Contacts	Val Bosscher bosscher.valerie@epa.gov (312) 886-6731
Expectations	<p>States establish and maintain minimum professional standards for the operation and maintenance of all public water systems to ensure that properly trained and certified professionals are overseeing the treatment and distribution of safe drinking water and to promote compliance.</p> <p>Provide documentation to U.S. EPA showing the ongoing implementation of the program to avoid 20% withholding of the DWSRF grant. Annual reports must include operator certification reporting measures. MDEQ commits to respond to comments from the previous year's approval letter.</p> <p>For operators of CWSs and NTNCWSs: Provide training and certification opportunities for new operators and for operators upgrading and renewing certification for existing operators, including training to ensure sustainable water utilities and supplies.</p> <p>Participate in quarterly Operator Certification/Capacity Development quarterly calls with Region 5 staff and other Region 5 States.</p> <p>MDEQ staff attended the February 2018 Region 5 Operator Certification/Capacity Development workshop.</p> <p>Participate in development/planning and attending the Region 5 Operator Certification/Capacity Development workshop to be held at Region 5 in Chicago in FY 2019 and/or FY 2020; date TBD.</p> <p>Region 5 plans to re-evaluate the Region 5 States' Operator Certification Program as part of the annual review process, to ensure the none Baseline Standards are met, as outlined in EPA's Operator Certification.</p>
State Commitment	<p>Water efficiency is an ongoing effort. Courses are available that address issues related to sustainable infrastructure (such as capacity development, asset management, infrastructure planning, water loss, etc.)</p> <p>MDEQ's Operator Certification program's data system needs upgrades. Assessment of those data needs is being conducted in 2018.</p> <p>Asset Management has been a focus during 2017 and 2018 at MDEQ.</p>

	<p>During FY 2017, MDEQ's Operator Certification program hired two staff, which helped implement the review of the States Operator Training and Certification Program, and to increase program accomplishments. Specifically,</p> <ul style="list-style-type: none"> --MDEQ improved outreach by offering course in different areas of the state, such as the UP, enabling more people to attend trainings and become certified. --Updates to the website have recently been made. The Operator Certification program underwent Lean Process Improvement in the fall of 2017. One immediate result was to increase renewal processing to weekly, improving customer service. Improvements to the data system will be included in the program's larger data system project, with plans to make it compatible with SDWIS/Prime. --MDEQ is evaluating options to conduct increased lower level exams. --Several asset management trainings were offered in FY 2017. --RTCR questions were on FY 2017 exams. Questions have been evaluated and modified as needed. Additionally, RTCR requirements were added to training curriculum.
<p>Region 5 Assistance</p>	<p>Region 5 to host Operator Certification/Capacity Development workshop in FY 2019 and/or FY 2020, date TBD, to facilitate State discussions and lessons learned. By early FY 2019, Region 5 to survey states regarding availability and ability to travel for an in-person meeting in FY 2019.</p> <p>Region 5 will continue to track if MDEQ is reporting Type 12 violations, Failure to have a qualified/certified operator. MDEQ has committed to reporting 40 CFR 141.130(c) operator certification TT violations to SDWIS/Fed and has reported past violations (most recently in 2017), when they occur. Due to technical assistance, not many systems are out of compliance with this requirement.</p> <p>Region 5 sustainable water infrastructure (SWI) workgroup will continue to provide training/outreach materials to water system operators and technical assistance providers, in coordination with States.</p>
<p>Discrepancies</p>	<p>.</p>
<p>Milestones</p>	<p><i>Ensure annual Operator Certification Annual Report for FY 2018 is provided to Region 5 by December 31, 2018.</i></p>
<p>Self-Assessment and Evaluation</p>	<p>Region 5 approved MDEQ's 2017 operator certification program annual report (see Region 5 approval letter, dated December 5, 2017). MDEQ's implementation of the operator certification program complies with the requirements of the federal operator certification guidelines. Michigan continues to recognize the importance of properly trained and certified operators in protecting public health.</p> <p>Additional staff were brought on in 2017 to support Michigan's Operator Certification Program.</p>

MDEQ is encouraged to continue to enhance the Operator Training/Certification Tracking System to aid in the tracking of operator/system compliance, including recommendations from the recent Lean Process Improvement exercise. This data system does need upgrades in FY 2018.

RTCR questions were added to fall 2016 certification exams.

Improvement suggestions for all states:
 Continue state efforts to assess operator turnover and work with water systems to ensure systems are under the direct supervision of a qualified operator.
 Continue to ensure that both CWSs and NCWSs, as well as TNCWS where required by state rules, are not without certified operators.


Initiate action (e.g., technical assistance, enforcement) promptly to protect public health at systems without a qualified operator, in order to prevent systems being without a qualified operator for an extended period of time (e.g., greater than six months).


Consider how training, technical assistance, or examinations can be used to strengthen knowledge and implementation of best practices to reduce lead in drinking water.


Engage external stakeholders and internal staff on program review to identify opportunities to improve program implementation.

See excerpt below from EPA’s FY 2015/FY 2016 End-of-Year Evaluation Report regarding Michigan’s Operator Certification program.


Relevant Attachments/References


 MI FY 2017 OpCert Annual Letter.pdf
 see Region 5 approval letter, dated December 5, 2017


 1_FY2017 Annual OTC Report to EPA.pdf
 Final state annual op cert report


 _MDEQ FY2017 ARDP - EOY - FINAL.pdf
 See State’s PWSS workplan end-of-year report, submitted Dec 2017.

MDEQ’s Operator Training and Certification website:
https://www.michigan.gov/deq/0,4561,7-135-3308_3333_4171---,00.html

	 <p>OIC policy deq-odwma-399-011</p> <p>Operator-in-Charge: Required Oversight Policy</p> <p><i>Optional:</i> Include as relevant attachments/references: original state submittals (e.g., initial operator certification reports), applicable state administrative codes, state policies/guidelines, web page(s).</p>
--	---

Excerpt from EPA's FY 2015/FY 2016 End-of-Year Evaluation Report regarding Michigan's Operator Certification program.

Operator Certification: MDEQ established and implemented minimum professional standards for the operation and maintenance of public water systems to ensure that trained and certified professionals are overseeing the treatment and distribution of safe drinking water and to promote compliance. MDEQ provides documentation to EPA Region 5 annually, to show the ongoing implementation of the operator certification program to avoid 20% withholding of the DWSRF grant. The FY 2015 and the FY 2016 Operator Certification reports were received by their respective deadlines and approved. Highlights from EPA Region 5's approval letters include:

- Compliance rates of systems with an Operator-in-Responsible Charge are as follows: In FY 2015, CWSs had a 99.9% compliance rate, NTNCWSs have a 97.6% compliance rate, and TNCWSs have a 95.2% compliance rate (where required by state rules). In FY 2016, CWSs had a 99.8% compliance rate, NTNCWSs have a 97.3% compliance rate, and TNCWSs required by state rules have a 96.9% compliance rate
- MDEQ should continue to ensure adequate resources are available to implement the program through fees, State funds, and DWSRF set-aside funds.
- EPA Region 5 recommends that MDEQ periodically review trends of recent renewal rates, combined with the trends of recent new operator certifications, to see if future staffing and compliance needs at Michigan water systems will be sufficient to ensure an adequate number of certified operators in Michigan.
- EPA Region 5 recommends MDEQ consider how continuing education opportunities, technical assistance, and/or operator certification examinations can be used to strengthen operators' knowledge and implementation of corrosion control technology, and improve knowledge on how to identify lead service lines and lead components in the distribution system.

During the upcoming year, EPA Region 5 plans to continue to evaluate EPA Region 5 State's Operator Certification Programs to ensure the nine Baseline Standards are met, as outlined in EPA's Operator Certification Guidelines.