

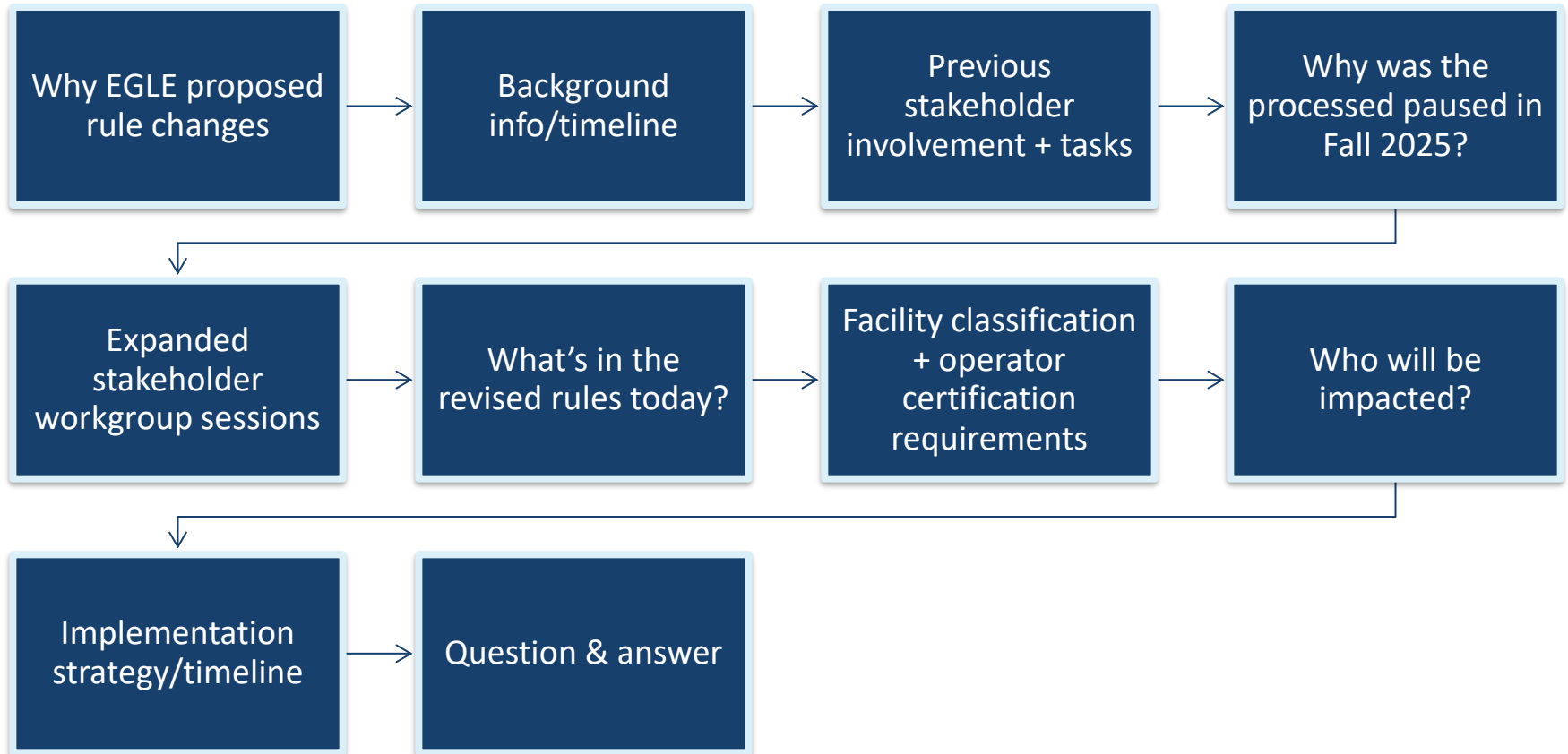
New Collection (Sewer) System and RTB Operator Certifications

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Agenda



Why did EGLE consider the rule changes?

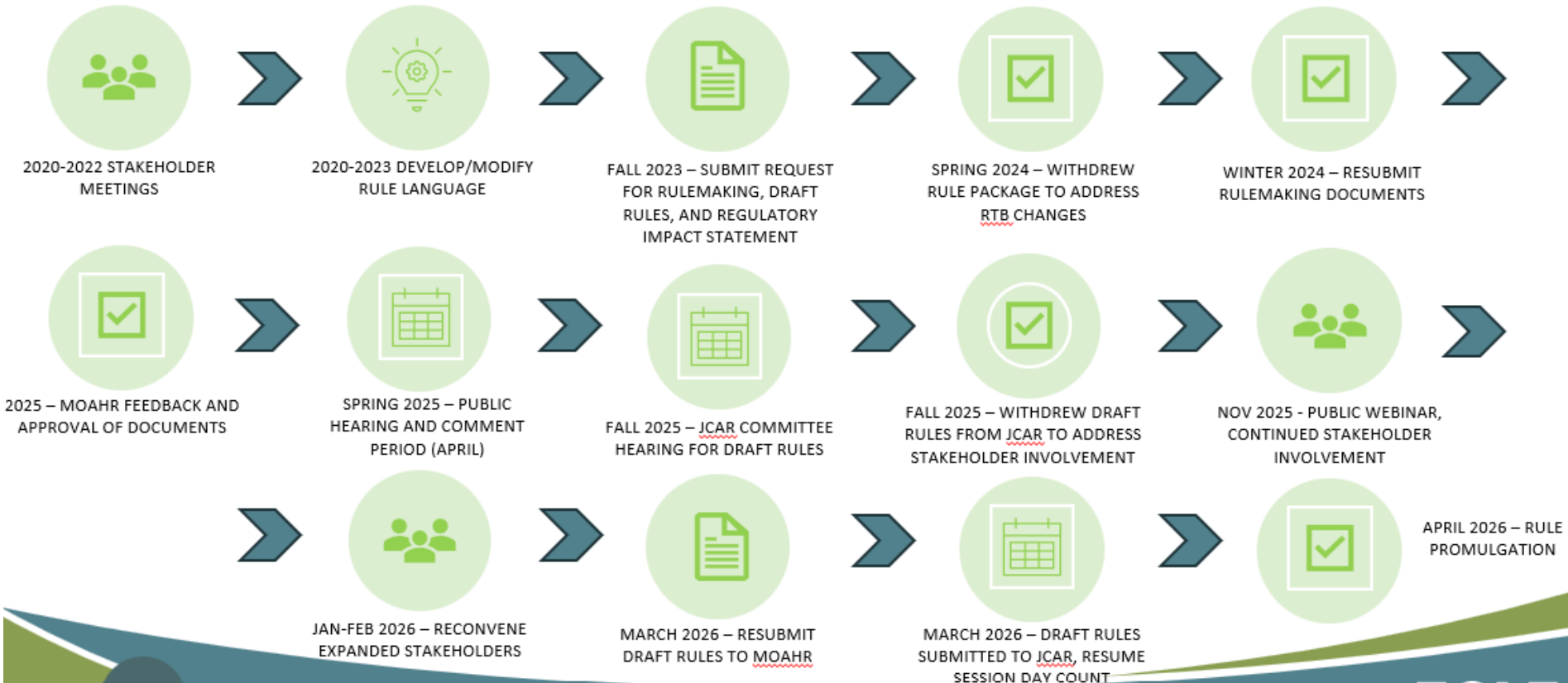
Collection systems

- No current classification or certification requirements
- Part 41 requires proper operation and maintenance of sewerage (treatment **and** collection) systems
- Currently not permitted; primary regulatory tool is enforcement

Retention treatment basins (RTBs)

- Currently classified as Class D WWTP systems since they do treat and are permitted to discharge
- Not the same as a conventional WWTP, so RTB classification/certification is necessary

Background/timeline



Previous stakeholder involvement + tasks

18+ municipal officials (large and small), private organizations, EGLE staff

- Group was formed from EGLE conversations with members of MWEA and expanded from there

18 stakeholder meetings from 2020-2022

- Mostly online (pandemic)

Four new collection system classifications

- C1, C2, C3, C4
- Education and experience reqs for certification
- Renewal requirements
- Exam question/answer bank

Why was the process paused in Fall 2025?

--Joint Committee on Administrative Rules (JCAR) thought EGLE did not do enough to include the right types of communities or notify them of the upcoming regulations
--College education seen as burdensome



--EGLE paused the process and held the November 2025 webinar to consider an expanded stakeholder workgroup for a better rule set



--The updated rules were adopted in April 2026

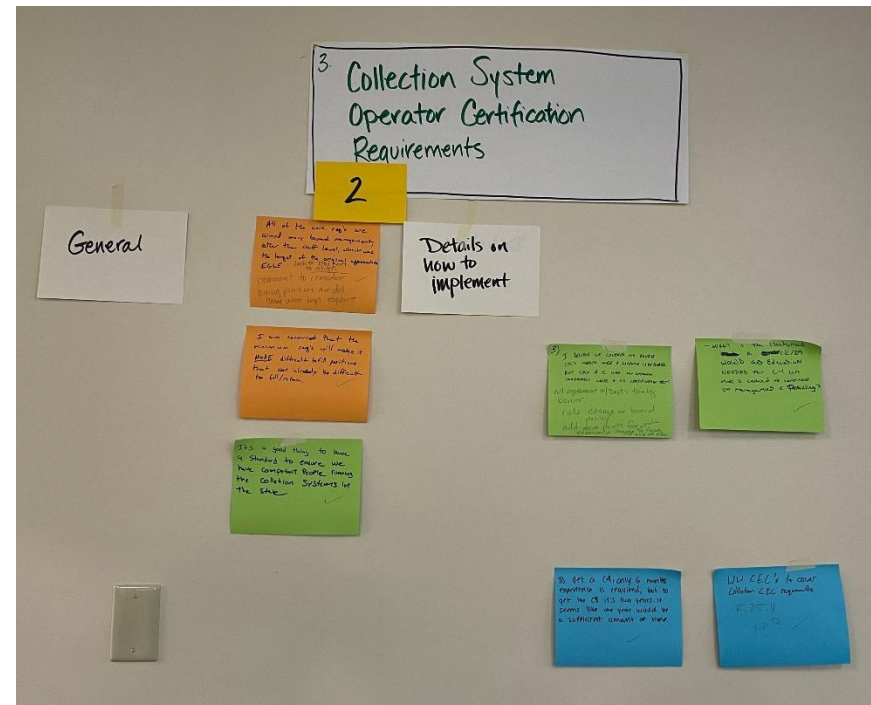
Expanded stakeholder workgroup sessions

Meeting 1 – Jan 2026

- EGLE grouped draft rules into 9 “buckets”
- Workgroup provided 39 comments based on these buckets
- 11 rule areas/changes were identified/suggested

Meeting 2 – Feb 2026

- EGLE modified draft rules based on feedback and polled workgroup
- Asked if proposed rule changes resolved the issues



What's in the revised rules today?



New/updated definitions



Collection system facility classifications and operator certification requirements/CECs



RTB facility classifications and operator certification requirements/CECs



Restricted certification language after initial facility classification/reclassification



Non-Governmental Ownership – Current Policy WRD-010 will apply until EGLE develops a new policy

Collection system facility classifications

- Four system classifications
 - C1, C2, C3, C4
 - Based on population served
- Each community's collection system is classified based on population served

(a) Class C1, collection systems serving or designed to serve a population of 50,000 or more persons.

(b) Class C2, collection systems serving or designed to serve a population of 10,000 or more, but less than 50,000, persons.

(c) Class C3, collection systems serving or designed to serve a population of 2,000 or more, but less than 10,000, persons.

(d) Class C4, collection systems serving or designed to serve a population of 150 or more, but less than 2,000 persons unless otherwise required by the department.

Collection system operator certification requirements

C1 – 5 yrs of AOE in C2 or higher, at least 1 yr
supervisory/MOR

C2 – 4 yrs of AOE in C3 or higher, at least 1 yr
supervisory/MOR

C3 – 2 yrs of AOE in any classified system

C4 – 1 year of AOE in any classified system

No sequence, take the exam you need

High school or equivalent required for all levels

Municipal Board of Certification will assist with definition for
“acceptable operational experience” – EGLE Policy

AOE – Acceptable Operational Experience

MOR – Major Operational Responsibility

RTB facility classification & certification requirements

- Current Class D facilities will be reclassified to RTB

(5) Class RTB, treatment facilities that retain and treat discharge from approved facilities serving a combined sewer system in accordance with its discharge permit.

(h) Class RTB. To be eligible to write the examination for a class RTB certificate, the applicant shall comply with both of the following requirements:

- (i) Have completed high school or its equivalent.
- (ii) Have completed 1 year of acceptable experience in the operation of a class RTB facility.

RTB – Retention Treatment Basin

Restricted certifications

EGLE
Alyssa Sarver
A, B, C, D, C1-R
12345

July 15, 2026
July 15, 2029

RTB restricted certs may be issued after reclassification

Notification within 90 days after reclass for staff that want restricted certs

Operators must have Class D or higher WWTP cert to earn restricted cert



Collection systems are not required to have a certified operator until two years following classification

Restricted certs may be issued up to two years **after** classification

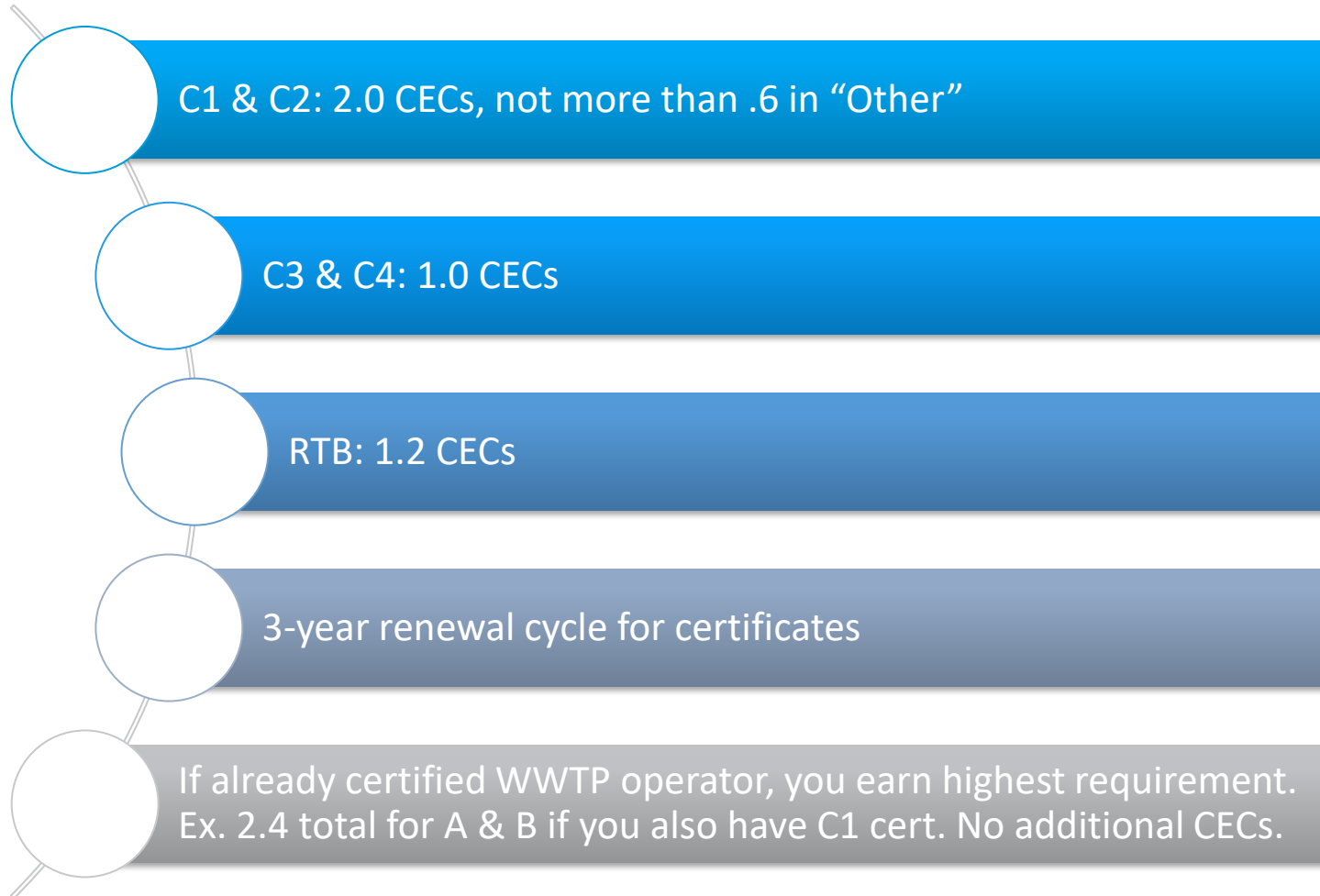
Operators must meet the work experience requirements in the rules to qualify

May be issued to certified WWTP operators if they also maintain the collection system



Op Cert staff will develop restricted applications for RTB and collection systems; certifications will look slightly different

Operator certification renewal requirements



Who will be impacted?

- **Contributing municipalities** with collection systems that convey sewage to a regional WWTP **will be classified and will need a certified operator**
- RTB classification and certification requirements
 - **RTB facilities will be reclassified**, and operators will need the RTB certification
- Only one certified operator is required to comply with the proposed rules and Part 41 statute
 - EGLE must formally classify facility before operator certification is required

Who will be impacted?

- Municipalities **with** a WWTP will not be prioritized by EGLE
 - Classification of WWTP is required under Part 41 and NPDES permit, and collection system O&M is already part of this
 - **EGLE understands the desire to certify operators within these collection systems;** this will be considered when developing the implementation strategy

Implementation strategy/timeline



'Part 41 – Sewerage Systems Permit Approval – WRD-010' revision of policy (early 2027)

Updated requirements for non-governmentally owned systems will take effect once the policy has been revised



RTB classification (2028)

Need to develop an RTB exam prior to reclassification



Collection system classifications (no earlier 2028)

Need to develop the C1-C4 exams prior to classifying collection systems

Classification of collection systems will follow an established priority process



CMOM permit (ongoing)

We commit to re-engaging with stakeholders and following a similar path to the rulemaking process

Michigan Department of
**Environment, Great Lakes, and
Energy**

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Michigan.gov/egle



Thank You!

More Questions? SarverA@Michigan.gov

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