

Building Water System Operator Certification: Association of State Drinking Water Administrators White Paper



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The Association of State Drinking Water Administrators (“ASDWA”) issued a May 17th white paper titled: *Building Water System Operator Certification (“White Paper”)*

The White Paper was prepared for ASDWA by the Environmental Science Policy & Research Institute.

The White Paper introduces the topic by noting that the Safe Drinking Water Act requires that each and every public water system (“PWS”) comply with the statutory requirements unless it meets all of the following conditions:

1. Obtains all of its water from, but is not owned or operated by, a PWS to which such regulations apply;
2. Does not sell water to any person;
3. Is not a carrier which conveys passengers in interstate commerce; and
4. Consists only of distribution and storage facilities (and does not have any collection and treatment facilities)

The White Paper asserts that when supplemental disinfection is added in a building, the 4th condition, 'treatment', is triggered and the building may be defined as a PWS. If so, the Safe Drinking Water Act requirements such as sampling for certain regulated parameters and having a certified water operator as the operator may be imposed.

The White Paper references increased interest in building water quality, citing Centers for Disease Control and Prevention and Centers for Medicare and Medicaid Services efforts to control Legionnaires' disease (referencing the importance of internal plumbing such as cooling towers, decorative fountains, spas, pools etc.). Directives or memos issued by those agencies are stated to have highlighted the need for building water management plans and in some cases supplemental water treatment. Such supplement treatment is stated to require compliance with the Safe Drinking Water Act triggering certain requirements.

As a result, the White Paper states:

The question then becomes one of defining the responsibility of that certified operator, who generally has no training or experience in building water systems.

The White Paper reviews topics such as:

- Issues with building water systems
- Knowledge, Skills and Abilities
- Building Water Management Plan Organization and Standards/Requirements
- Building Water System Components and Operation Water Delivery System
- Water Quality Certification
- Hot Water Systems
- Secondary Water Processes
- Comparison of Building Water System Operation Requirements with those of Distribution Systems and Treatment Plants (includes a detailed table comparing knowledge, skills, and abilities needed for certification of operators of PWS water treatment operations, PWS distribution systems and building water systems)
- BWS Operation and Regulation – Results from an ASDWA Survey and Phone Interviews
- Recommendation for a New Class of Operator for Building Water Systems

A copy of the White Paper can be downloaded [here](#).