



GUAM ENVIRONMENTAL PROTECTION AGENCY • AHENSIAN PRUTEKSIÓN LINA'LA' GUÅHAN
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GUAM ENVIRONMENTAL PROTECTION AGENCY (GEPA)

DIVISION 2 – WATER CONTROL | INDIVIDUAL WASTEWATER PROGRAM

POLICY MEMORANDUM 2026-01

SUBJECT: Certification and Approval Requirements for Type 4 (ANODS) Wastewater Onsite Treatment System Installers and Operation & Maintenance (O&M) Service Providers

I. PURPOSE & AUTHORITY

This Policy Memorandum establishes the official certification, licensing, and professional operational standards required by the Guam Environmental Protection Agency (GEPA) for any individual or business entity seeking approved status to install, commission, or service Type 4 Advanced Nitrogen-reducing Onsite Disposal Systems (ANODS) on Guam.

This policy is promulgated under the authority of **10 GCA Chapter 45, § 45106** and **22 GAR Division 2, Chapter 12**. These qualifications are strictly enforced to protect Guam's sensitive Groundwater Protection Zone (GPZ) and coastal waters from nitrogen contamination.

II. CORE SYSTEM CERTIFICATION REQUIREMENTS

To qualify for GEPA approval as an authorized installer or O&M service provider of Type 4 (ANODS) systems, applicants must simultaneously satisfy three core pillars of licensing and training:

Qualification Pillar	Requirement Standard	Primary Verifying Authority
1. Manufacturer Certification	Valid, system-specific training and authorization certificate for NSF-certified systems (listed under NSF/ANSI 245 / NSF 425 as referenced). ☐ Manufacturer's NSF certification	Technology Manufacturer & GEPA
2. Professional Trade License	Active Certified Licensed Plumber.	Guam Contractors License Board (GCLB)



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3. Professional Wastewater Operator	Class I (Minimum / Level 1) Wastewater Treatment Operator License.	GEPA Operator Certification Board
4. Guam Water Quality Standard	Criteria standard stated Section 5104(A)(7)	GEPA

III. DETAILED ELIGIBILITY & CRITERIA Breakdown

1. Manufacturer Authorization & Certification

Because Type 4 (ANOD) systems utilize advanced biological processes to reduce total nitrogen in effluent by at least 50%, specialized technical competency is mandatory:

- **For Installers:** The applicant must provide direct, written manufacturer authorization to perform the physical installation and start-up commissioning of the specific proprietary Type 4 models they propose to install.
- **For O&M Providers:** If not the certified installer, the O&M provider must present written manufacturer authorization certifying their access to purchase genuine replacement parts and service the specific Type 4 toilet facilities under contract.

☐ Installer certification or manufacturer training provided to O&M personnel on system components, treatment process, and maintenance requirements.

Date: _____

- **Compliance Standard:** The proposed system must hold active certification under NSF/ANSI Standard 245 (or NSF 425 as referenced). GEPA independently verifies this status via public registries before approving any application.

2. Guam Contractors License Board (GCLB) License

- All service firms must maintain an active contractor license in good standing with the GCLB.
- The designated lead technical personnel on site must hold a valid **Certified Licensed Plumber** designation. This ensures that all lateral lines, grade parameters, and structural plumbing comply with both local building laws and the International Private Sewage Disposal Code (IPSDC).

3. GEPA Wastewater Operator Certification (Minimum Level 1 / Class I)

To guarantee that these miniature biological treatment plants are maintained by qualified environmental professionals:

- Both installation and O&M provider firms must retain on their active staff, or secure via a legally binding sub-contract, at least one certified **Class I (or higher) / Level 1 Wastewater Treatment Operator**.
- The operator must be actively certified under the Water & Wastewater Operator Certification Regulations (**22 GAR Chapter 11**).



IV. REGISTRY PROCESS

To be listed on GEPA's publicly available Registry of Approved Type 4 Installers and O&M Providers, applicants must execute the following steps:

1. **Submit Qualification Packet:** Deliver a complete package to the GEPA Individual Wastewater Program containing:
 - o Valid GCLB Plumber License documentation.
 - o Copies of the current Class I / Level 1 (or higher) Wastewater Treatment Operator certification.
 - o Written manufacturer authorization letters for the specific NSF-certified models.
2. **Review & Listing:** Upon technical review by the Chief Engineer and final signature from the Administrator, the firm will be added to the official GEPA Registry.
3. **Change in Status:** Registered providers must notify GEPA within ten (10) business days of any change in their operator employment or manufacturer authorization status.

V. REVOCATION OF APPROVED STATUS

Regulatory Notice (22 GAR § 12118(b)(5)): The GEPA Administrator reserves the right to suspend or permanently revoke any installer or O&M provider's approval, in writing, for any of the following reasons:

- **Fraud or Deception:** Submitting falsified reports, commissioning documents, or maintenance records to GEPA.
- **Negligence:** Failing to exercise reasonable care, professional judgment, or the application of standard sanitary engineering knowledge while performing system duties.
- **Performance Failure:** Exhibiting an administrative history of failing to comply with GEPA regulations, individual permit requirements, or manufacturer-mandated service procedures.

EFFECTIVE DATE & APPROVAL:

This policy is issued and effective immediately to safeguard Guam's unique freshwater resources.

Administrator, Guam EPA

Date: July 14, 2026 (*Reflecting 22 GAR Chapter 12 and GEPA Standards*)

