

reimbursement should stimulate construction in these other areas to a level approaching that required to meet the implementation schedules submitted to the Federal Government.

Supplemental financing should provide for specific allocations to States. Without such allocation, it will be impossible to plan what projects could be financed during a given year. Allocations could be based on the allocations set forth in Public Law 660 as amended or on formulas considering the population equivalent of a given waste; the Biochemical Oxygen Demand removal required to achieve the approved stream classification; anticipated volume of waste to be treated; anticipated strength of wastes to be treated or other similar methods. Under the language of the proposed bill as now written, it is conceivable that ten States could receive all funds appropriated for contractual agreements with the remaining forty States receiving no assistance.

The proposed bill requires the maintenance of a reserve fund to meet expansion or replacement requirements of the treatment works service area as a qualifying condition for contractual agreements. Such reserve funds are illegal in Massachusetts, and it is possible that some municipal charters in other States would not allow reserve accounts. The language of the proposed bill as pertains to user charges and the maintenance of a reserve fund has been interpreted by some as double payment for waste treatment facilities—user charges to amortize the cost of the facilities and additional charges to establish a reserve account. The other alternative to establishing a reserve account is expanding the bonding requirement. Such a requirement could meet with strong resistance in local referenda. Serious delays in qualifying for contractual agreements could be incurred should a municipality find it necessary to obtain additional legislative bonding authorizations.

Banks involved in municipal financing state that the debt service contract indebtedness reflects on a community's bonded indebtedness. If a community's debt limit is to be exceeded, special authorizing legislation would be required. Such action could delay the funding of a proposed treatment works. Bonding authorizations in the past have been granted to cover only a municipality's contribution to the cost of new facilities and not the cost of the entire project. Additional bonding authority would be required for those communities already authorized to sell bonds in anticipation of project construction thereby causing additional delays in getting needed projects underway.

The New England Interstate Water Pollution Control Commission supports the concept of mandatory certification of waste treatment plant operators as an instrument for improved waste treatment plant operation. The Commission has recently sponsored three one-week courses as in-service training for operators and is working toward establishment of a permanent school to train new people not now with the waste treatment industry. All courses will be designed to qualify an operator for certification. Upon completion of future in-service training courses, the New England Water Pollution Control Association certification examination will be offered to all operators on a voluntary basis. New Hampshire has a mandatory certification program and the Massachusetts legislature is considering a similar program for the Commonwealth. The New England Interstate Water Pollution Control Commission will encourage the development of a regional mandatory certification program. Coupled with the certification program must be an adequate wage scale for plant operators, and a concerted effort to make the industry more attractive as a career.

The States signatory to the New England Interstate Water Pollution Control Compact maintain a schedule of waste treatment plant inspections and require submission of periodic operational reports. Operation and maintenance surveillance could be strengthened to insure increased plant operation efficiency. New York State provides for operation and maintenance grants of one-third of the total eligible cost of operating and maintaining treatment facilities. To qualify under this program, the municipality must:

"(1) Maintain standard operating reports, including the results of laboratory tests to evaluate plant performance and determine the effect of the plant effluent on the receiving waters.