

STATE OF MICHIGAN
DRAFT WORK PLAN FOR
LOCAL ASSISTANCE FOR CAPACITY DEVELOPMENT SET-ASIDE
GRANT YEAR 2021
FISCAL YEAR 2022

Background

40 CFR Part 35, State and Local Assistance, Subpart L Drinking Water State Revolving Funds were established to “. . . ensure that each State’s program is designed and operated in such a manner as to further the public health protection objectives of the Safe Drinking Water Act (SDWA). . .” (§35.3500). To achieve the objective of improved public health protection, §35.3535(e) allows a State to use up to 15 percent of its capitalization grant allotment to assist in the development and implementation of local drinking water protection initiatives and other State programs. Specifically, Subrule (iv) allows a State to provide technical and financial assistance to public water systems as part of a capacity development strategy.

Goal

Provide direct technical assistance to public water supplies to enhance and maintain their technical, managerial, and financial capabilities.

Funds Requested

A table is attached that shows the **projected** balances remaining in the Local Assistance for Capacity Development Set-Aside for the open grant years and the amount requested in the grant year 2021 application. Please note that these projected balances are estimates calculated from actual and projected expenditures. They do not reflect amounts that may or may not have been drawn on the grants yet by staff in the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Administration Division. Also, it is important to note that projected expenditures do not reflect any federal sequestrations or unknown state funding reductions that may occur.

From the 2021 grant, EGLE is requesting \$1,890,290 from the Local Assistance for Capacity Development Set-Aside authorized under Section 1452(g)(2)(e) of the federal SDWA for Local Assistance for Capacity Development work. This level is approximately seven (7) percent of the 2021 grant amount of \$27,004,000.

Funds will be expended from the oldest open grant year first.

Full-Time Equivalentents

In fiscal year (FY) 2022, approximately 12.8 full-time equivalentents (FTE) in the Drinking Water and Environmental Health Division (DWEHD) will be supported with funding provided by the Local Assistance for Capacity Development Set-Aside funds, for an approximate total cost of \$1,730,280. In FY 2022 additional FTEs will be supported with funding provided by the

remaining Local Assistance for Capacity Development Set-Aside from the previous year. Specific activities that these FTEs perform are detailed below. This figure includes salary, fringe benefits, and travel costs incurred to perform work tasks and professional development. The figure does not include other expenses such as supplies, materials, information technology, and telecommunications equipment and support.

Program Work

The FTEs funded by this Set-Aside are responsible for providing direct technical assistance to public water supplies to enhance and maintain their technical, managerial, and financial capabilities. Specific duties include:

- Assisting public water supplies in acquiring and maintaining capacity as outlined in Michigan's Capacity Development Strategy for Existing Water Systems, dated August 1, 2000.
- Providing technical guidance related to Per- and Polyfluoroalkyl Substances (PFAS) detections and assisting public water supplies vulnerable to PFAS, including providing information and guidance related to treatment technologies, alternate sources, additional sampling, education, and communication.
- Educating water supplies and operators on the recently implemented PFAS Michigan Compiled Laws (MCL) requirements.
- Educating water supplies and operators on the Michigan Lead and Copper Rule requirements, including inventory, sampling, corrosion control optimization and lead service line removal.
- Receiving and reviewing monitoring data and making associated compliance determinations in a consistent and coordinated manner. Educating water supplies about proper sampling methodologies and timely and complete submittal of data to ensure that any exceedances are addressed.
- Providing guidance to assist supplies in preparing required reports to ensure that they meet regulations.
- Conducting sanitary surveys within the required timeframes.
- Conducting plan reviews for source changes and significant changes in treatment; water supply improvements.
- Performing source water assessments at Community Water Supplies (CWS).
- Providing one-on-one technical assistance and consultation with water supply personnel to assist in the understanding of, and compliance with, state and federal requirements.
- Reviewing asset management plans, general plans, reliability studies, distribution system material inventories and engineering studies to assure regulatory compliance and optimum performance.
- Providing cross connection control guidance and training and continuing to assist CWS with the development of residential cross connection programs.
- Develop partnerships with colleges and local entities to enhance workforce initiatives that will assist in new recruitment of drinking water operators in the State.
- Exploring innovative methods to reach water supply owners and operators to promote greater long-term compliance, including the use of videos on YouTube.
- Providing reminder letters for compliance activities.

- Providing extensive training for new and existing staff, including continuing the successful “Rule School” series providing an in-depth review of the Act 399 Rules; a routine series of analyst training; and an extensive training series on engineering topics in both classroom and hands-on settings as Covid-19 safety precautions allow. These trainings, in addition to outside training for staff, are positively impacting the consistency and technical expertise available to the regulated community.
- Provide emergency response training to DWEHD staff, with subsequent follow-up to water supplies.
- Conduct water emergency tabletop exercise training participated in by EGLE staff, water supplies, and local emergency management team.
- Update capacity development strategies to reflect asset management promotion, as per the 2018 America's Water Infrastructure Act (AWIA), section 2012.

Financial Adequacy of New Public Water Supplies

The DWEHD will incur costs for determining if new CWSs meet the financial adequacy requirements of the program. In addition, the DWEHD will continue to explore innovative ways to increase capacity development work at small public water supply systems – both CWSs and Noncommunity Water Supplies (NCWS).

NTNCWS Source Water Assessments and Capacity Assessments (\$80,000)

Nontransient, Noncommunity Water Supply (NTNCWS) Source Water Assessment Updates-- The reauthorization of the federal Safe Drinking Water Act of 1996, Section 1453, required states to develop and implement a Source Water Assessment (SWA) Program. In addition, there are some new NTNCWSs each year that require the owner to complete Capacity Development and Emergency Procedures Planning forms. Local health departments (LHD) are a resource for the completion of Capacity Development forms at NTNCWSs and are performing or updating Source Water Assessments at NTNCWSs. The DWEHD will continue to partially reimburse LHDs for these completed activities.

Capacity Assessments at Nontransient, Noncommunity Water Supplies--

The DWEHD will continue to partially reimburse LHDs for part of their costs in performing capacity assessments at new NTNCWS.

Surveillance Visits at Noncommunity Water Supplies (\$65,000)

The DWEHD will continue to partially reimburse the LHDs for performing annual site visits in situations where the noncommunity public water supply provides treatment for public health purposes. There are also a few supplies meeting strict requirements to operate with nitrate levels between 10 and 20 mg/L. Funds are requested to increase public health protection at these supplies through annual surveillance visits to verify continuous public notice and availability of bottled water. Surveillance visits are not a sanitary survey. The purpose is to assist and help build a relationship with the operator, confirm that regulatory requirements are being met, and the treatment system provides a continuous supply of water meeting drinking water standards. This is in addition to the assistance that is provided by LHD staff to treatment operators and the review of operation reports.

Field Analysis Equipment (\$10,000)

DWEHD will train staff and continue to purchase field test kits, pressure monitoring equipment, and flow testing equipment for district staff to use in calibration, technical assistance, and training of public water supply staff.

Technical Assistance Reference Materials (\$5,000)

DWEHD will continue to invest in updated American Water Works Association industry standards and manuals of practice multi-user site license for staff to use as reference materials. DWEHD will also continue to purchase current versions of engineering and water supply reference books, plumbing codes, and other industry standards. These reference materials will be used by staff when developing training materials and providing technical assistance to public water supplies.

Agency Responsibilities

LHDs will be reimbursed a set amount for each updated source water assessment completed. The LHDs will submit completed assessments to DWEHD technical staff. Staff working under the Wellhead Protection Set-Aside will track the updating of the assessments and determine if the NTNCWSs qualify for substantial implementation of source water protection activities. Susceptibility ratings of each source will be provided to each NTNCWS water system owner upon completion of the assessment. DWEHD technical staff will also approve invoices received from the LHDs for payment.

DWEHD Administration Section staff will process payments for approved invoices and track all grant expenditures. They will also track total expenditures from the Set-Aside. Finally, the EGLE Administration Division will request draws from the capitalization grant for the expenditures processed by the DWEHD Administration Section.

Schedule

This work plan covers the period from October 1, 2021, to September 30, 2022.

Evaluation Process

DWEHD staff will assess the work progress and work products with grant recipients and other contractors no less than every six months during the contract period. Final payment is dependent upon full completion of contract commitments.

At the beginning of each calendar year, DWEHD employees, under the direction of their supervisor, must create performance objectives. These objectives may correlate to tasks and special projects included in the Set-Aside work plans. Employees are expected to demonstrate progress in accomplishing the desired outcomes throughout the year. All DWEHD managers meet with their staff periodically to discuss available metrics, current workload, and what shifts, or task prioritization may be needed. State will inform the United States Environmental Protection Agency (U.S. EPA) of changes to the work described in the workplans.

Progress Reports

At the end of each fiscal year, DWEHD will submit an activity report to the U.S. EPA listing activities and expenditures from the Local Assistance for Capacity Development Set-Aside.

Local Assistance for Capacity Development Set-Aside Projected Expenditures and Balances Remaining Grant Years 2018-2021					
Grant Year	Grant Number	Date Awarded	Amount Awarded	Projected Amount to be Expended by September 30, 2022	Projected Balance Remaining on September 30, 2022
2018	975487-18	10/01/2018	\$2,726,600	\$2,726,600	\$0
2019	975487-19	10/01/2019	\$2,701,000	\$2,701,000	\$0
2020	975487-20	10/01/2020	\$1,351,450	\$1,351,450	\$0
2021	Pending	10/01/2021	\$1,890,280	\$1,390,280	\$500,000