

STATE OF MICHIGAN
DRAFT WORK PLAN FOR
PUBLIC WATER SUPPLY SUPERVISION 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(d) allows a State to use up to ten (10) percent of its capitalization grant allotment for State program management activities including administration of the State’s Public Water Supply Supervision (PWSS) Program.

Goal

Implement Michigan’s PWSS Program.

Funds Requested

A table is attached that shows the **projected** balances remaining in the PWSS Program Set-Aside for the open grant years and the amount requested in the grant year (GY) 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 \$2,700,400 for the PWSS Program Set-Aside authorized under Section 1452(g)(2) of the federal SDWA. This level is approximately ten (10) percent of the 2021 grant amount of \$27,004,000.

The amount requested will be used to support full-time equivalents (FTE) and other program activities. Funds will be expended from the oldest open grant year first.

Full-Time Equivalents

In fiscal year (FY) 2022, at least 13.3 FTEs will be supported with funding provided by the PWSS Program Set-Aside for an approximate total cost of \$1,802,324 utilizing 2021 grant year and previous year balances. 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 remaining money will be used for expenses such as supplies, materials, information technology, telecommunications equipment, overhead, and support.

Program Work

The FTEs funded by the PWSS Program Set-Aside will conduct the activities required to maintain primacy of the PWSS Program in Michigan, including operator training and certification and capacity development work.

The Drinking Water and Environmental Health Division (DWEHD) is committed to continuous improvement in administration of the State's Public Water Supply Supervision (PWSS) Program. FTEs will focus on EGLE's commitments in the Annual PWSS Workplan, and those remaining items outlined in Michigan's Corrective Action Plan resulting from the United States Environmental Protection Agency's (U.S. EPA) Public Water System Supervision Program Review Final Report dated October 2017.

Activities include:

- Maintaining an inventory of public water supplies in Michigan.
- Providing compliance assistance to public water supplies.
- Conducting sanitary surveys and surveillance visits at public water supplies.
- Issuing permits for new construction or for modifications.
- Assessing public water supply compliance with the federal SDWA, the National Primary Drinking Water Standards, Michigan's Safe Drinking Water Act, 1976 Public Act 399, as amended (Act 399), and the Administrative Rules.
- Initiating escalated enforcement actions, when indicated, to compel a public water supply to comply with applicable federal and state drinking water regulations.
- Maintaining program data and submitting reports to the U.S. EPA as required.
- Maintaining a drinking water Operator Training and Certification Program and offering training on SDWA rules and operational procedures.
- Producing Michigan's Annual Operator Training and Certification Report.
- Producing Michigan's Annual Capacity Development Report and the triennial Capacity Development Report to the Governor.
- Providing clerical, managerial, and administrative support to the scientific and engineering staff performing the activities listed above.

Additional Program Activities

Compliance Monitoring Data Portal (CMDP) (\$250,000)

Michigan continues to work with Eastern Research Group (ERG) and their subcontractor Global Environmental Consultants (GEC) to work towards a pilot and full production adoption of CMDP. Funds will be transferred from the Blanket Purchase Agreement Contract (which ended June 3rd) to the new Safe Drinking Water Information System (SDWIS) Support Contract between U.S. EPA and Systalex and their subcontractors. Tasks will include training for laboratories and EGLE staff; training and help documentation; data preparation and migration; post implementation support; Data Validator support.

Software Subscription: GEC SWIFT, SWIMR and Cert Tracker (\$416,801)

Along with previous years' balance, utilize this funding source to pay the Software as a Service (SaaS) subscription agreement for GEC's Safe Water Information Field Tool (SWIFT), SWIMR (Safe Water Information Management Reporting), and Cert Tracker for PWSS sanitary surveys, report development and operator certification tracking. Michigan's contract with GEC will include a 9-month evaluation period of SWIFT, 6-month evaluation period of Cert Tracker, with an overall 5-year contract. In addition, GEC will host and provide maintenance of SDWIS State for both Community Water Supply (CWS) and Noncommunity Water Supply (NCWS), Data Synchronization Engine (DSE), and all supporting applications.

JIRA Service Desk and Help System for MiEHDWIS (\$31,275)

Utilize this funding source to procure products to improve the submission and handling of user help requests submitted to the division. With Jira Service Management and Confluence, EGLE-DWEHD can provide a service portal and knowledge database to all EGLE-DWEHD patrons, both internal and external. This allows DWEHD to move away from shared email boxes serving as the hub for help desk activities and allows EGLE to manage Michigan Environmental Health and Drinking Water Information System (MiEHDWIS) and program training content in one place.

These products will allow MiEHDWIS users, including public water supply owners and operators to easily access a self-service knowledge base of frequently asked questions, guides, and toolkits to help them increase their understanding to navigate within MiEHDWIS. It also allows for a help desk where questions are submitted by the users to get a response from DWEHD staff. This will allow DWEHD to better track what users are needing more instruction on and will generate metrics on our response time to questions and issues reported.

Local Health Department Compliance Assistance for the RTCR (\$200,000)

The statewide monitoring violation rate under the Revised Total Coliform Rule (RTCR) remains nearly as high as it was in the first year after the RTCR took effect. Local health departments (LHD) continue to struggle with the increased workload providing compliance assistance to noncommunity water supplies and fulfilling the additional reporting requirements. Compliance assistance takes the form of one-on-one education to water supply owners and operators, educational meetings targeted at seasonal system owners, RTCR reminder phone calls, and reminder mailers. LHDs are also expected to carry out increased required reporting to the State using manual spreadsheet entries for tracking and reviewing compliance with Seasonal Start Up procedures, Level 1 and 2 Assessments, and annual site visits related to reduced monitoring. The amount requested helps to support LHDs' RTCR work improving compliance of noncommunity supplies with requirements of the federal SDWA.

Agency Responsibilities

EGLE, DWEHD, administers Michigan's PWSS Program. DWEHD technical staff implements the CWS Program, and Michigan's LHD, under contract with EGLE, implement the NCWS Program. DWEHD managerial staff approve staff time charges and all applicable charges to the PWSS Program Set-Aside. DWEHD technical and managerial staff oversee the work conducted by the LHDs by review of quarterly reports and annual evaluations. All invoices submitted for payment from the LHDs are approved by DWEHD NCWS staff.

DWEHD Administration Section staff process expenditures, including the approved invoices for payment to the LHDs, and track grant, contract, and Set-Aside balances. The financial data included in this work plan and in the activity reports are obtained from the DWEHD Administration Section financial reports. Finally, EGLE Administration Division staff is responsible for requesting draws from the capitalization grants for the expenditures processed by the DWEHD Administration Section.

Schedule

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

Evaluation Process

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 U.S. EPA of changes to the work described in the workplans.

Finally, each year, DWEHD PWSS Program staff establish an Annual Workplan with U.S. EPA-Region 5 staff. The Annual Workplan includes all activities that DWEHD staff must satisfactorily complete during the year. At the end of the year, both DWEHD and U.S. EPA-Region 5 staff review if the activities were completed or not, and a joint conference call is held to go through all the activities in the plan. Also, U.S. EPA-Region 5 staff annually assess Michigan's overall performance on meeting national and regional performance goals by means of a written assessment that identifies the areas where Michigan's program has met or exceeded the goals and areas that need improvement.

Progress Reports

At the end of each fiscal year, the DWEHD will submit an activity report to the U.S. EPA listing activities and expenditures from the PWSS Program Set-Aside.

**Public Water System Supervision 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	\$2,499,477*	\$2,499,477	\$0
2020	975487-20	10/01/2020	\$2,702,900	\$2,702,900	\$0
2021	Pending	10/01/2021	\$2,700,400	\$1,800,400	\$900,000

*2019 grant award: \$2,583,455 (includes U.S. EPA in-kind) with \$2,499,477 the amount DWEHD is able to spend from the Set-Aside.