

STATE OF MICHIGAN
DRAFT WORK PLAN FOR
SMALL SYSTEMS TECHNICAL ASSISTANCE SET-ASIDE
GRANT YEAR 2021
FISCAL YEAR 2022

Background

40 CFR Part 35, State and Local Assistance, Subpart L Drinking Water State Revolving Funds (DWSRF) 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 two (2) percent of its capitalization grant allotment to provide technical assistance to small systems.

Goal

Assist small public water systems in meeting the requirements of Michigan’s Safe Drinking Water Act.

Funds Requested

A table is attached that shows the **projected** balances remaining in the Small Systems Technical Assistance (SSTA) 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 \$540,080 for the SSTA Set-Aside authorized under Section 1452(g)(2) of the federal SDWA. This level is two (2) percent of the 2021 grant amount of \$27,004,000.

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

Full-Time Equivalents

In fiscal year (FY) 2022, approximately 2.1 FTEs in the Drinking Water and Environmental Health Division (DWEHD) will be supported with funding provided by the SSTA Set-Aside, for an approximate total cost of \$290,080. 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. The FTEs funded by this Set-Aside are for existing positions within the DWEHD. Specific activities that these FTEs perform are detailed below.

Program Work

The FTEs funded by this Set-Aside are responsible for:

- Providing technical assistance to local health department (LHD) staff responsible for implementation of the Noncommunity Water Supply (NCWS) in Michigan.
- Assisting LHD staff in providing direct technical assistance to NCWS owners and operators, registered well drillers, and pump installers.
- Overseeing the work conducted by the LHDs to implement the NCWS throughout Michigan. Reviewing engineering plans and issuing permits for treatment systems at NCWSs. Also provide direct assistance to small public water supplies that are treating for Per- and Polyfluoroalkyl Substances (PFAS).
- Providing direct assistance to small public water systems that employ treatment to comply with drinking water standards, primarily those that treat for arsenic and for nitrates.
- Providing direct assistance to facilities that are exploring, or have installed, secondary treatment for public health purposes therefore becoming a small public water supply.
- Conducting one-on-one or group technical training for LHD staff, NCWS owners and operators, and other stakeholders involved in the operation and maintenance of small systems. This technical training typically focuses on:
 - Sampling and monitoring practices.
 - Performing Revised Total Coliform Rule (RTCR) Level 1 Assessments and Seasonal Start Up Procedures.
 - Compliance with NCWS regulations or Michigan's well construction code.
 - Investigatory techniques used to identify a problem with a NCWS or well, and remedies to correct a given problem.
 - Cross connection control, including proper use and maintenance of control devices.
 - Properly completing and submitting all required documentation or certifications, such as monthly operation reports.
- Assisting LHDs, NCWSs, and consultants involved with the development and operation of small systems, with understanding rule and code requirements to improve compliance rates.
- Updating technical guidance documents, fact sheets, brochures, or forms that can be used by the LHDs or distributed to NCWSs, well drillers, and pump installers to help improve or maintain compliance with applicable regulations.
- Administering Michigan's NCWS database, WaterTrack.
- Administering lead consumer notification (LCCN) mailings and tracking of returned certifications centrally for nontransient supplies statewide.
- Providing and maintaining the means for LHDs to report compliance records not able to be processed through WaterTrack.
- Providing periodic reports to LHDs of NCWS supplies that don't have a certified operator or have one whose certification will soon be expiring.
- Providing user stories to Michigan Environmental Health and Drinking Water Information System (MiEHDWIS) development team for functionality enabling NCWS

owners/operators and LHD personnel the ability to submit and track documents related to compliance and reporting activities and the ability to look up information and update records for water supplies.

- Providing clerical, managerial, and administrative support to the scientific and engineering staff performing the activities listed above.

Additional Program Activities

In FY 2022, the following activities will be funded all or in part using monies from the SSTA Set-Aside. Monies will always be expended in the oldest open grant year first.

Local Health Department Noncommunity Water Supply Training (\$0)

DWEHD will hold virtual training for the NCWS coordinators from Michigan's LHDs. It is anticipated that the focus in FY 2022 will include some basic training for newer LHD staff, addressing of issues arising from the Coronavirus Pandemic, and rolling out modified or newly implemented compliance reporting procedures that address findings from the United States Environmental Protection Agency (U.S. EPA) audits conducted in FY 2016. In addition, the training may include new IT functionality available in MiEHDWIS, as well as a review of the first year of implementation of the PFAS MCL.

WaterTrack Maintenance (\$50,000)

WaterTrack is the primary database used by EGLE to manage NCWS compliance and enforcement data. EGLE intends for the NCWS Program to utilize U.S. EPA's system that is in development to replace the Safe Drinking Water Information System (SDWIS-State). While progress is being made at the national level, WaterTrack must be relied on further into the future. It may take up to one year after the new federal database is released before it is ready to be used in Michigan. Keeping WaterTrack functional is more and more challenging with each update to the operating system on the department's servers.

WaterTrack Enhancements (\$200,000)

A number of upgrades to WaterTrack will facilitate the routine database work related to compliance monitoring and assurance carried out by LHD and State personnel. Significant burden of repetitive work will be reduced by the addition of an offline report that displays high sample results and candidate monitoring violations across all analyte groups and monitoring frequencies. The addition of email addresses to the current export file for reminder notices will make it easier for LHDs to use email instead of mailed post cards for their initial sampling reminders each monitoring period. Upgrades related to WaterTrack's interface with Wellogic have increased priority due to loss of additional important functionality for the WaterTrack user due to recent changes made in Wellogic and to the environment on which Wellogic is hosted. Without even an estimation of how many years out a new federal database to replace SDWIS-State will be, it is necessary to invest in ways to maintain and enhance WaterTrack's ability to track and report federally mandated compliance information.

Agency Responsibilities

The EGLE, DWEHD, administers the Michigan Public Water Supply Supervision (PWSS) Program. DWEHD technical staff implements the Community Water Supply Program and Michigan's LHDs, under contract with EGLE, implement the NCWS Program. DWEHD staff, funded by the SSTA Set-Aside, provide technical assistance to both the LHDs and to NCWS

owners and operators to assist them in maintaining compliance with SDWA regulations. DWEHD managerial staff approves staff time charges and all applicable charges to the SSTA Set-Aside.

DWEHD Administration Section staff processes expenditures and track grant, contract, and Set-Aside balances. The financial data included in this work plan and in the activity reports is obtained from 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 covers 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 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. 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; a joint conference call is held to go through all the activities in the workplan. 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.

LHD performance in completing their contractual requirements for administration of the NCWS program is evaluated by DWEHD staff annually. In addition, staff review reports from the LHDs submitted quarterly throughout the year, and staff routinely communicate with their assigned LHDs to remain current on issues or problems they may be encountering. A LHD cannot receive payment for services performed under their contract until the request has been reviewed and approved for payment by the DWEHD staff person assigned to that LHD.

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 Small Systems Technical Assistance Set-Aside.

**Small Systems Technical Assistance 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	\$545,320	\$545,320	\$0
2019	975487-19	10/01/2019	\$540,220	\$540,220	\$0
2020	975487-20	10/01/2020	\$540,580	\$540,580	\$0
2021	PENDING	10/01/2021	\$540,080	\$290,080	\$250,000