

**Michigan Department of Environmental Quality
Water Bureau**

ANNUAL REPORT TO EPA ON CAPACITY DEVELOPMENT PROGRAM - FY 2005

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List of Acronyms

Act 399	Safe Drinking Water Act, 1976 PA 399, as amended
ACO	Administrative Consent Order
AWMP	Abandoned Well Management Program
AWWA	American Water Works Association
CCR	Consumer Confidence Reports
CDP	Capacity Development Program
CWS	Community Water Systems
DEQ	Department of Environmental Quality
DWRF	Drinking Water Revolving Fund
eDWR	Electronic Drinking Water Reporting
ERP	Emergency Response Plans
FAP	Financial Action Plan
FY	Fiscal Year
LHD	Local Health Departments
MHC	Manufactured Housing Community
MiTAPS	Michigan Timely Application and Permitting Service
MMBA	Michigan Municipal Bond Authority
MOR	Monthly Operations Reports
MRWA	Michigan Rural Water Association
NCWS	Noncommunity Water Systems
NTNCWS	Nontransient Noncommunity Water Systems
OTCU	Operator Training and Certification Unit
PWSID	Public Water System Identification Number
RCAP	Rural Community Assistance Program
RUS	Rural Utilities Service
SDWA	Federal Safe Drinking Water Act
SDWIS/Fed	State Drinking Water Information System / Federal
SDWIS/S	State Drinking Water Information System / State
SME	Subject Matter Experts
SNC	Significant Noncomplier
SWPP	Source Water Protection Program
TANS	Threat Advisory Notification System
TMF	Technical, Managerial, and Financial
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VA	Vulnerability Assessments
WB	Water Bureau
WHPP	Wellhead Protection Program

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1.0 Introduction

The 1996 Amendments to the federal Safe Drinking Water Act (SDWA) added provisions for each state to develop a Capacity Development Program (CDP). The objective of the CDP is to enhance public health protection by helping water systems to develop and maintain the technical, managerial, and financial (TMF) capacity they need to consistently deliver a safe, reliable, and abundant supply of drinking water to all customers.

The purpose of this document is to demonstrate to the United States Environmental Protection Agency (USEPA) that the state is implementing a capacity development strategy as required in the SDWA Section 1420(c)(1)(C) or risk losing 20 percent of the annual Drinking Water Revolving Fund (DWRFF) allotment that the state is otherwise entitled to receive under the SDWA Section 1452.

This report corresponds to the criteria set forth in the USEPA memo “Reporting Criteria for Annual State Capacity Development Program Implementation Reports” dated June 1, 2005. This memo was from Cynthia Dougherty, Director, Office of Ground Water and Drinking Water, and addressed to Drinking Water Program Managers, Regions I-X. The report is due to the USEPA within 90 days of the end of the reporting period. Michigan’s reporting period is the state Fiscal Year (FY) that ends on September 30, so this report is due by December 30 of each year. Elements discussed in this report are:

- New Systems
 - Identify legal authority
 - Identify control points
 - List of new systems
- Existing Systems
 - Identify tools and activities
 - Identify systems
 - Identify needs and provide assistance
 - Review implementation and address findings
 - Modify strategy

2.0 New Systems

2.1 Identify Legal Authority

The legal authority remained unchanged during the reporting period. The CDP is implemented by the Water Bureau (WB) of the Department of Environmental Quality (DEQ) through amendments to the Safe Drinking Water Act, 1976 PA 399, as amended (Act 399), by application of capacity development policies and guidance documents and through cooperation and/or partnerships with other agencies.

2.2 *Identify Control Points*

The control points remained unchanged during the reporting period. As outlined in *New Community Water System Capacity Guideline Document*, dated May 1, 2000, new systems must demonstrate TMF capacity before serving water to the public. The new systems program relies on two control points: construction permits and final inspection. Generally, a construction permit is issued based on the technical capacity of the proposed system. For Community Water Systems (CWS), the financial and managerial capacity requirements may still be pending while the system is under construction. Approval to commence operation is not granted until after an acceptable final inspection and approval of a Financial Plan and an Operations Plan that address financial and managerial capacity. For nontransient noncommunity water systems (NTNCWS), the WB has delegated the authority to the local health departments (LHD) to review, approve, and issue construction permits. When water systems begin the permit application process, the LHD helps them outline their financial and managerial capacity. Prior to receiving approval to commence operation, the NTNCWS must submit a financial plan and a managerial plan that includes a contingency plan and designation of a certified operator.

2.3 *List New Systems*

Lists of CWS and NTNCWS that became active during FY 2003 through 2005 are in Appendix A. The lists indicate which systems appeared on a Significant Noncomplier (SNC) list during those years.

3.0 **Existing Systems**

3.1 *Identify Tools and Activities Used*

The *Capacity Development Strategy for Existing Public Water Systems*, dated August 1, 2000, lists the programs, tools, and/or activities to help systems acquire and maintain capacity. This section describes each of the major program elements, the target audience, and a discussion of how each helps to achieve and enhance capacity.

3.1.1 DWRF

Target Audience: CWS and nonprofit noncommunity water systems (NCWS), though only municipal CWS are participating

The 1996 Amendments to the SDWA authorized the creation of a revolving fund with state match to provide low-interest loans for repairs or enhancements to help water systems comply with the SDWA. This fund is similar to the State Revolving Fund created to assist water pollution control projects. The capacity development provisions of the SDWA are funded through the DWRF allotment.

Michigan's DWRF is coadministered by the DEQ and the Michigan Municipal Bond Authority (MMBA.) The DEQ handles all programmatic issues, while the MMBA serves the DWRF Program with its financial expertise. Prior to the creation of the DWRF, project financing for CWS was left largely to the local unit of government or to individuals investing in their own systems. The DWRF provides a source of infrastructure financing. Through FY 2005, the DWRF has committed over \$381 million in low-interest loans for 126 projects. Examples of projects include constructing or upgrading water treatment

plants, booster pumps, and storage facilities; and replacing water mains. Some loan applicants have received binding commitments but are not yet ready to proceed with the project.

Funds for the three largest projects were committed in FY 2003 through 2005. The fourth segment of the upgrades to the city of Flint water treatment plant that will provide needed reliability for their routine source of supply from Detroit was funded in FY 2003. Independence Charter Township in Oakland County is beginning a financially segmented project to add well capacity, enhance reliability, and to comply with the new arsenic standard. The city of Detroit will be rehabilitating a clearwell at one of the city's five water treatment plants.

Funds have been committed for a total of 126 projects, and 77 have been completed. The following table summarizes the loan commitments since FY 1998:

DWRF Loan Commitments by FY								
	1998	1999	2000	2001	2002	2003	2004	2005
Number of Projects Committed	24	21	7	10	15	21	12	16
Commitments of Funds (\$M)	\$53.24	\$51.38	\$27.64	\$26.71	\$38.15	\$69.72	\$60.17	\$54.01

Michigan's Drinking Water Program centers on proper water system construction to prevent jeopardizing the safety of either the source or the finished water. To that end, priority of DWRF projects favors those communities that are participating in a Source Water Protection Program, which is discussed in section 3.1.3.

3.1.2 Field Staff

Target Audience: CWS and NCWS

Water system operators maintain a long-term relationship with field staff that is the primary contact with water systems for capacity development. The CWS are served by WB staff in 8 district offices, and NCWS are served by staff from 43 LHD under contract with the WB. A primary objective of the district staff and the LHD is to provide excellent customer service from the construction permit process for new infrastructure through the regulatory oversight process and the continual assessment and assistance process for the duration of a system's operation. Field staff achieves that objective through assistance to systems in meetings, by telephone, and during site visits.

"Since I have been here, I have pushed systems to face the upcoming new arsenic MCL. Systems have begun to increase water rates, run pilot studies, propose compliance schedules, evaluate entering into an ACO (administrative consent order), hire engineers to propose and evaluate options, etc. I have pushed systems to properly maintain their treatment and distribution systems.... I have met with the council in Owendale to talk about what they need to do about arsenic compliance. I will most likely meet with other councils yet this year."
 - A district engineer

Assistance or consultation has been the preferred method to prevent systems from falling into noncompliance. At times the district staff serves as both capacity assistance providers as well as regulators. When assistance is not accepted or effective, staff initiates enforcement actions.

Capacity of existing systems is assessed with routine evaluations, also known as sanitary surveys, which rate systems satisfactory, marginal, or deficient. District engineers detail their findings and recommendations in a letter to the system.

Evaluation letters may include a list of milestones with dates by which the items are expected to be addressed. Options for capacity assistance may also be offered. These evaluation letters help systems understand the severity of the deficiencies and importance of acting on the recommendations.

The following table shows the number and percentage of evaluations, surveillance visits, and construction permits in recent years in the CWS program. The table does not include activities in the Manufactured Housing Community (MHC) Program:

System Evaluations, Visits, and Construction Permits										
	FY 2001		FY 2002		FY 2003		FY 2004		FY 2005	
Evaluations Conducted	401		488		294		353		484	
	#	%	#	%	#	%	#	%	#	%
Satisfactory	311	78	384	78	219	75	278	79	370	76
Marginal	45	11	57	12	45	15	53	15	44	9
Deficient	23	6	30	6	22	8	19	5	11	2
Not Rated	22	6	16	3	8	3	3	1	59	12
Other			1	0						
Visits	1,301		1,360		1,117		1,243		1,398	
Construction Permits (Received/Issued)	1,836 / 1,830		1,709 / 1,703		1,889 / 1,801		1,962 / 1,867		1,984 / 1,787	
Permits Issued Within 10 Business Days of Receipt	#	%	#	%	#	%	#	%	#	%
	1,384	76	1,381	81	1,381	77	1,268	68	1,288	72

The data reflect the following:

- The decrease in the number of evaluations or sanitary surveys during FY 2003 was due, in part, to a merge with another division and an early-out retirement option for senior state employees. As a result, evaluations were not conducted at the expected rate of about 350 per year during FY 2003, but sprang back in FY 2004 as staff became more comfortable with the structure and management continued to emphasize timely evaluations.
- The percent of systems rated satisfactory have remained about the same.
- Some evaluations are still pending in FY 2005. Greater efforts are being made to more accurately track evaluations and ensure evaluations are completed, which includes sending a letter of findings to the system within 30 days of the on-site evaluation.
- The number of on-site visits fell in FY 2003 but began to climb in FY 2004. These visits are conducted to meet with operators and local officials, to perform evaluations, or to check the status of projects.
- The number of permits issued (within 10 business days of receipt) has dropped in FY 2004, possibly due to the record number of permit applications received and the turnover of engineering staff during FY 2004.
- The above table does not include the percent of NCWS that have been inspected in the previous five years. Since FY 2000, the percent of up-to-date evaluations has risen to 96 percent. The goal is 100 percent.

Deficient systems receive priority for assistance. Assessments are based on compliance with health-based standards, monitoring and reporting requirements, qualified operator requirements, and requirements in Act 399 for TMF sufficiency, such

as well construction, general and contingency plans, and financial requirements for privately-owned systems.

Many times, a one-time capacity assistance meeting is sufficient to keep systems in compliance. In other situations, the district engineers spend more time with the system to help solve more complicated concerns or refer the system to other capacity assistance providers. At times, water system operators want to comply, but they do not have the financial resources or support from community leaders to make the changes that are necessary, especially when options are particularly expensive, or acceptable alternatives are not readily available. However, when capacity assistance is met with resistance, letters of notice are used to outline the consequences of failing to correct deficiencies and may offer one more opportunity to meet with staff to arrive at a mutually agreed compliance schedule. When these difficult cases arise, the WB increases surveillance activities and attempts to address potential enforcement action at the same time.

"I've been trying to get systems to do more preventative maintenance, especially well/pump inspections.... I'm getting a few communities to commit to some preventative well/pump maintenance.
- A district engineer

In these cases, district staff may attend municipal board meetings or council meetings to discuss a compliance schedule with specific items and completion dates and discuss the possibility of formalizing a compliance schedule that is incorporated into an Administrative Consent Order (ACO). Community leaders need to hear the benefits of agreeing to a course of action that allows them time to address their problems without further enforcement or penalties. During this time, district staff will be more closely involved to help the system meet the deadlines in the ACO. District staff interaction with systems as capacity assistance providers has resulted in very few department orders for noncompliance (eight since 2003) and a high rate of compliance statewide.

System operators and managers have many opportunities to interact with field staff outside the capacity assessment arena. Field staff attends, participates, and presents at periodic regional operator meetings to discuss upcoming regulations, regional issues, and to network with operators and managers. District staff also serves as instructors at operator training workshops, serve as subject matter experts for operator certification examinations, and present training at professional meetings. When systems begin to develop their project plan to apply for a DWRP loan, district staff consults with the system and works with its consulting engineer to ensure the project plan is eligible for funding.

I meet with water boards on request. On a few occasions, I have asked to be placed on a Board's agenda.
- A district engineer

3.1.3 Source Protection

Increasing numbers of systems are taking steps to protect their drinking water sources. The SDWA established and funded source water assessment activities, but did not provide funds to implement Source Water Protection Programs (SWPP) for surface water sources. Federal funding for Wellhead Protection Programs (WHPP) is available through the DWRP. To further protect drinking water aquifers from contamination, Michigan has implemented a grant program to locate and properly plug private and public wells no longer being used that are located in a community's wellhead protection area.

3.1.3.1 Source Water Assessments to Protection

Target audience: CWS and NCWS

The SDWA required all CWS and NCWS sources used for drinking water to be assessed by December 2003. Michigan's nearly 18,000 sources serving approximately 10,600 NCWS and 1,250 CWS were identified, potential sources of contamination were inventoried, and susceptibility to contamination was determined by the combined efforts of the following agencies:

- WB
- Michigan State University, Institute of Water Research
- LHD
- Groundwater Education in Michigan Centers
- Michigan Department of Agriculture
- United States Geological Survey (USGS)
- Michigan Public Health Institute
- Technical assistance contractors

The susceptibility of a groundwater source was based on a quantitative evaluation of geologic sensitivity, well construction details, water chemistry, and contamination sources. The surface water assessments evaluated water intake sensitivity and calculated susceptibility to potential sources of contamination. Organizations that played a significant role in the assessments of surface waters sources included the USGS, National Oceanic and Atmospheric Administration, Detroit Water and Sewerage Department, and Environment Canada.

Source water assessment data is being used to prioritize communities based on their overall susceptibility rating for intensive outreach efforts, including site visits and quarterly newsletters, to encourage protection efforts and follow-up assistance to communities that are developing SWPPs. Joint quarterly meetings between the WB and Michigan Rural Water Association (MRWA) are held to assess progress and discuss future activities.

To build upon the source water assessments at NCWS, the WB has developed and piloted a self-assessment tool to help the operators identify activities that may increase the risk of a contamination incident. The operator then identifies actions to reduce the risk and sets target dates to complete the actions.

3.1.3.2 WHPP

Target Audience: Municipal CWS

The WHPP assists local communities utilizing groundwater for their municipal drinking water systems in protecting their water source. A WHPP minimizes the potential for

contamination by identifying and protecting the area that contributes water to municipal water supply wells and avoids costly groundwater cleanups. Of the 455 municipal systems in Michigan using groundwater as their water supply, 292 are involved in some aspect of wellhead protection such as performing a delineation, inventorying the potential threats, and developing contingency plans. Of those 292 systems, 135 have completed all the steps and have an approved WHPP. As a result, 89 percent of the population of the state served by municipal systems using groundwater is in communities taking action to protect their groundwater sources.

3.1.3.3 Abandoned Well Management Program (AWMP)

Target Audience: Municipal CWS directly – Private well owners

No one knows exactly how many unplugged and improperly abandoned wells exist in Michigan. The National Ground Water Association reports that Michigan leads the nation in the number of new wells drilled annually. It is quite likely that Michigan has more abandoned wells than any other state.

As a result of the Clean Michigan Initiative, 65 communities have applied for and received matching grants to administer a program intended to locate and properly plug abandoned wells inside the delineated wellhead protection area of their drinking water wells. Some highlights of these projects include conducting public education programs to assist in identifying these potential hazards, identifying and mapping the location of abandoned wells, developing specifications for bidding abandoned well plugging work, and developing proactive abandoned well plugging ordinances. The LHD issues permits to install wells and now they oversee plugging of abandoned wells. They are encouraging private well owners to properly plug abandoned wells when a replacement well is drilled. Due to these efforts, Michigan properly plugged nearly 85 percent of abandoned wells during some recent well replacement projects. In 2005, a project in Rudyard Township in the Upper Peninsula earned the MRWA Exemplary Efforts in Environmental Protection Award. For this project, 37 wells that varied in depth from 200 to 400 feet were located and properly plugged at a cost of about \$500 per well. Another project in the Upper Peninsula plugged 21 wells, two of which were at sites with leaking underground storage tanks.

The WB recently participated in the investigation of a case involving the illegal abandoning of wells. The defendants had been retained by the state to plug abandoned wells under an Environmental Remediation contract with the state. They claimed the wells were properly plugged, submitted false reports, and were paid by the state for their work. Subsequently, the DEQ discovered that the wells were not properly plugged. The contractors involved made restitution to the state, with one receiving a jail sentence. Adjudicating these types of cases protects and maintains the integrity of the AWMP and provides a significant deterrent to other contractors.

3.1.4 Operator Training and Certification

Target Audience: CWS, NTNCWS, and transient NCWS that use treatment

Each CWS, NTNCWS, and transient NCWS must be under the supervision of a certified operator, according to Amendments to Act 399. These operators must obtain continuing education credits to maintain their certification. As a result, operators are requesting and receiving more training opportunities. New training courses are developed based on

operator feedback, field staff input, and in response to new regulations with which water systems must comply.

3.1.4.1 Operator Training and Certification Unit (OTCU)

Target Audience: CWS and NCWS

The OTCU of the DEQ, Environmental Sciences and Services Division, provides over 30 training courses each year. The OTCU certifies nearly 80 other organizations and training providers that offer other opportunities for continuing education credits including online courses. Major program activities recently include:

- Issued over 600 new drinking water certificates and processed over 1,700 renewals in FY 2005 due to operators completing their continuing education requirements. The renewal program is based on a three-year cycle for all certification levels.
- Established the Expense Reimbursement Grant Program for water system operators employed by water systems serving 3,300 or fewer people. Three training providers were awarded contracts to participate in the program – MRWA, American Water Works Association (AWWA) Online Institute, and a private consultant.
- Implemented the computer program for Michigan training providers to submit attendee rosters electronically to OTCU via a proprietary software application.
- Utilized Subject Matter Experts (SME) to review and develop new questions for licensing examinations. The SME include water system operators holding licenses of the highest level in their category.
- Offered the first exams, using questions validated by the SME, for the higher level classifications of complete treatment and limited treatment operators. A new examination is currently being developed by the SME for distribution system operators.
- Developed and offered new training courses and revised existing courses in response to new rules and based on new technologies including hands-on training and advanced level courses. Conducted highly technical seminars geared toward larger water treatment plants.
- Created an Internet site for certified operators to view pertinent information regarding their certifications. Water system supervisors can better manage their employees by having access to this information.

3.1.4.2 Small CWS and NCWS

A restricted certification option is available for existing operators of certain small systems to continue to operate at their current location if they receive additional training. Approximately 90 percent of the NTNCWS met the certified operator requirements by the effective date of the requirement. However, the rapid turnover rate typically experienced at these small systems puts the system out of compliance with the certified operator requirements until a replacement operator is employed.

Six continuing education modules have been developed for operators holding the lowest level certification. Twenty LHD are contracting with the WB to provide continuing education for these operators.

3.1.4.3 MHC

For the past several years, the staff of the WB responsible for oversight of the CWS serving MHC has provided training targeted for operators of these systems, many of which hold restricted licenses. The audience is not only operators, but managers and owners of these CWS. Many of these operators are employed by more than one system or may also work at NTNCWS, so the training is improving the operation and maintenance of many more systems than the number of operators present for this training. The training is slightly different each year to keep the operators interested and engaged. In 2005, 186 operators and owners attended training offered at five sites across the state that covered:

- Distribution Flushing and Cleaning
- Chlorination
- Methamphetamine Laboratories and Contamination Issues
- Compliance with new arsenic standard
- Sanitary Surveys (system evaluations)
- Electronic Drinking Water Reporting (eDWR)

In the past, the MHC operators and owners have interacted with WB staff that specializes in the unique aspects of these communities including wastewater and drainage issues. Due to recent budget cuts, some of the nonregulatory programs are being eliminated and staff is being reassigned. The WB recognizes the importance of continuing efforts to maintain compliance with drinking water regulations at small water systems, such as those serving MHC, but there will be a period of transition as staff are reassigned and the regulatory responsibility for MHC are moved to the district offices. In the meantime, the MHC have shown improved infrastructure due to an increased number of completed sanitary surveys identifying deficiencies. These communities are also moving forward to find ways to comply with the new arsenic standard by the effective date in 2006.

3.1.5 Financial Assessments

Both new and existing systems have opportunities to achieve and maintain financial capacity. As mentioned previously, financial capacity assessments would not be required of existing systems unless serious deficiencies in technical or managerial capacity existed. However, voluntary participation in financial assessments has been forthcoming.

3.1.5.1 New Systems

Target Audience: New CWS and NTNC

New systems must demonstrate financial capacity before serving water to the public. In the NCWS Program, the system may receive help from the LHD during the permit application process to develop a financial plan. They must submit a financial plan, including a budget, to the LHD in order to receive approval to commence operation. In the CWS program, systems submit their financial plan and supporting documents to the DEQ for review and approval. Systems may continue to develop their plan during the construction phase of the water system, but must receive approval for their financial plan prior to the final inspection of the system.

3.1.5.2 Existing Systems

Target Audience: CWS serving fewer than 10,000 people that are either municipally owned or subject to association bylaws

To help existing CWS improve financial capacity, the WB has partnered with another DEQ division to conduct financial assessments of systems that serve a population of less than 10,000, received a less than satisfactory rating in a recent evaluation, and are not making satisfactory progress toward correcting the deficiencies due in some part to financial difficulties. The criteria have been expanded to systems that *could* benefit from a financial assessment. As a result, several systems that are currently in compliance, but are concerned about future challenges such as meeting the new arsenic standard, are making progress toward that end by improving their financial capacity.

Outcomes

41 municipally-owned CWS have requested or been nominated by district staff to undergo an assessment

23 systems have received their FAP and are beginning to implement their plan.

A financial analyst in the DWRF Program conducts the assessment of the community's existing financial health and develops a Financial Action Plan (FAP). The assessment is a review of financial documents and an on-site meeting with system representatives. A FAP is a tailor-made comprehensive plan to strengthen the system's financial situation based on the assessment. Short- and long-range goals are identified in the FAP followed by a step-by-step process to reach the goals. Useful tools to help complete the steps are included with the FAP, such as a sample

water use and rate ordinance and a service agreement checklist. The assessment is not designed to provide funding; however, financing options are discussed at the on-site meeting. Further information on obtaining funding is provided with the useful tools, when applicable, such as forms to help apply to the DWRF. The system is expected to carry out the FAP, and the WB is available to assist when requested. The FAP is intended to also be a guide for the district staff. If a system falls into noncompliance with Act 399 partly due to failure to carry out the FAP, then the district staff may choose to include the FAP tasks and timeframes into an ACO. An outline of a typical assessment report is included in the Appendix.

In 2004, the city of Beaverton underwent a financial assessment and is reaching their goal to develop the financial capability to fund present and future needs. Beaverton in Gladwin County developed a capital improvement project list to address many of their system deficiencies and began to seek grants and other funding. They formed a Utilities Committee, consisting of government, business, and citizen members to work on a fair

water rate structure to adequately fund the water system. In the meantime, the city manager has been replaced, which derailed the process somewhat, but the city is still hoping to seek funding for a significant water project.

Rose City in Ogemaw County was one of the first systems that volunteered to undergo a financial assessment. Due to political reasons, the system was slow to begin to implement their plan. However, they have progressed in their FAP and are now setting aside \$20,000 each year to fund an arsenic removal system without having to borrow money.

Applying for a DWRF loan can be a daunting task for small cities and villages. However, district staff reports that some of their communities that underwent a financial assessment may have become motivated to apply for DWRF money. The financial assessment may have helped put into perspective the need to move forward and helped these communities move incrementally toward gathering the information and documents needed to apply for a loan. Galesburg in Kalamazoo County, which underwent a financial assessment in 2003, submitted a project plan to upgrade aging infrastructure and increase storage capacity. In FY 2005, two DWRF project plans were submitted and included treatment to meet the new arsenic standard: Carsonville in Sanilac County, which participated in the pilot financial assessments in 2002; and Byron in Shiawassee County, which underwent a financial assessment in 2003.

To advertise the availability of financial assessments, the WB has made presentations at the Michigan Section, AWWA, regional meetings and published articles in the *Water Works News*, a joint newsletter of the DEQ and the Michigan Section, AWWA. Some municipalities learned of the service through their engineering consultants.

3.1.6 Technical Assistance Contracts

Target Audience: CWS and NCWS serving 10,000 or fewer people

Funds from the DWRF have been set aside for technical assistance to the 12,000 community and noncommunity water systems serving 10,000 or fewer people. Two new contracts were recently awarded, each for two years.

The first contract is to assess and reduce critical contaminants in small water systems. This will include on-site visits to systems with elevated arsenic levels and pilot projects at selected systems to develop arsenic reduction strategies and tools. On-site visits will also be conducted at small systems to collect and analyze samples for critical chemical contaminants. The contract also includes training sessions to LHD, NCWS, and others using training modules already developed concerning monitoring, treatment, evaluations, source water assessments, cross connections, contingency planning, and groundwater wells.

The second contract is to develop, test, and deliver training modules for community water systems. One set of training modules will address priority issues for operators, such as regulations, reporting, and recordkeeping; water sources and treatment; water quality monitoring; operation and maintenance; and contingency planning and emergency procedures. A second set will focus on topics for small system managers and financial officials, such as managing and financing small systems; system assessment, objectives, and options; establishing a budget; basics of rate setting; and legal framework.

3.1.7 Security

Target Audience: CWS and NCWS serving 50,000 or fewer people

Supplies are taking advantage of programs available to protect their systems from malevolent acts including training to complete vulnerability assessments (VA) and Emergency Response Plans (ERP), participating in water security table top exercises, and receiving the Threat Advisory Notification System (TANS).

The WB received approximately \$0.4 million from the USEPA to implement provisions of the federal Public Health Security and Bioterrorism Preparedness and Response Act of 2002. A total of 16 two-day workshops were conducted at locations around the state for public water systems serving between 3,300 and 50,000 people. Training participation included 452 personnel from 153 systems. The training helps systems to complete their VA and ERP, which include a review of water system operations, hazardous chemicals delivery and storage facilities, and prioritize vulnerable assets lists. Similar one-day security seminars at 30 locations were available to systems serving fewer than 3,300 people. Actual participation was 260 systems and 290 personnel. Continuing education credits are awarded for this training. A small number of higher risk systems also received direct on-site security training, including several NCWS.

Earlier this year, 20 utilities in the largest municipalities in the state participated in security tabletop exercises, each with unique scenarios designed to challenge the utilities in the event of an act of terrorism. Participants included representatives from the utility and the DEQ. Police, fire, and other emergency response people were in attendance at most of the exercises. The greatest benefit of these exercises was to bring together water and wastewater personnel and local fire and police department representatives. Another benefit of the exercises was to increase the awareness among water system personnel of the potential for terrorist acts.

The WB has developed a TANS for water and wastewater systems. The WB is continuing to gather and update e-mail addresses. An index of TANS notices that have been issued is available on the DEQ Internet Web site, <http://www.michigan.gov/deq> and includes changes in threat levels and security information and guidance.

3.1.8 Technical Assistance Providers

Target Audience: CWS and NCWS

The efforts of other organizations to enhance system capacity are an integral aspect of the CDP. An index of technical assistance providers was developed a few years ago and describes the services of each technical assistance provider agency. The index is a "yellow pages" that is periodically updated and published in the Michigan *Water Works News* of water systems, community leaders, and DEQ staff. Two provider organizations deserve highlighting due to their efforts to enhance capacity:

The Rural Community Assistance Program (RCAP) provides free technical assistance to rural communities of low to moderate median household incomes serving fewer than 10,000 people, with priority to those serving fewer than 3,300, to develop and manage affordable water, wastewater, and solid waste systems. Providers work on site with local community officials, community leaders, and system operators to assess capacity needs, review funding options, provide public education, prepare and facilitate public

communication, help select consultants, and help apply for funding for capacity projects. Local officials are taking advantage of RCAP services to achieve financial solvency through rate studies as well as help with project selection, compliance with existing and upcoming rule requirements, capital improvements planning, financing options, and VA and emergency response planning. Since FY 2002, RCAP has leveraged over \$13 million through low-interest loans, grants, and local funds. Projects include maintaining or achieving compliance at the villages of Detour, Cass City, and Honor; the cities of Reading, Sandusky, and Munising; and the townships of Gore and Ida. The RCAP also helped two villages apply for DWRF loans to meet minimum capacity requirements: Brooklyn submitted a project plan for FY 2006 funding to meet distribution and storage capacity requirements, and they also plan to enhance their security with intrusion alarms; Elkton applied for FY 2004 funding to rehabilitate wells.

The Rural Utilities Services (RUS) provides loans, grants, and loan guarantees to build, reconstruct, or rehabilitate water, sewer, solid waste, and storm sewer systems in rural communities serving 10,000 or fewer people with priority to low income communities; those with DEQ violations; systems with leverage from other funding sources; systems extending existing systems; and entities working together. The RUS provides technical assistance to applicants regarding environmental issues, engineering, construction, and federal financing. Loans are monitored until they are paid in full. Small communities serving populations under 5,000 took advantage of RUS funding in the past three fiscal years: 10 projects totaling \$19,529,000 in FY 2005, 14 projects totaling \$16,498,000 in FY 2004, and 11 projects totaling \$17,031,000 in FY 2003.

The ratio of grants to loans is weighted more heavily on loans and less on grants. The RUS goal remains to help the most needy low income communities, targeting those at 60 percent of the state median household income of \$27,461, however, with the minimal grant funds, communities will need to pay more. The RUS strives to increase leveraging of funds with other agency funds and private credit. All community assets in an applicant's general and enterprise funds are considered to determine what community funds can be available to the project. To ensure funding goes to communities that protect their source and manage their water system, applicants must have a WHPP, install water meters, and fund short-lived asset and replacement accounts. Security is receiving continued focus and applicants must complete VAs and ERPs before closing on loans, including systems serving fewer than 3,300 people.

The RUS also administers the Technical Assistance and Training Grant Program that funds Internal Revenue Service tax exempt private nonprofit organizations that have the proven ability, background, experience, legal authority, and capacity to provide technical assistance and/or training on a regional basis. Successful applicants are typically multijurisdictional groups, such as regional planning commissions, the National Rural Water Association, and the RCAP.

3.1.9 Enforcement

Target Audience: CWS and NCWS

Evaluations and compliance information becomes the basis for enforcement. When systems fail to return to compliance, escalated enforcement, including ACO and DEQ orders, can be initiated.

Before escalated enforcement is used, many systems are encouraged to return to compliance when they are assessed fines for violations. Michigan's administrative fines policy was updated in 2001 to include timely submittals of monthly operation reports (MOR) and Consumer Confidence Reports (CCR.) The increase from 58 fines initiated in FY 2001 to 67 in FY 2002 was due primarily to fines for failure to submit an MOR or a CCR.

	FY 2001	FY 2002	FY 2003	FY 2004	FY 2005
Number of Fines Initiated	58	67	51	35	46
Number of Initiated Fines for Failure to Deliver a CCR	0	10	3	10	21
Number of Initiated Fines for Failure to Submit an MOR	0	12	2	2	2

The increase in fines for failure to deliver a CCR in FY 2005 is possibly due to staff transitions in two of the eight district offices during the months that water systems are drafting their reports and preparing to deliver them to customers.

When a fine is not applicable or does not prevent further violations, the WB moves to Notice of Violations and ACOs. However, as mentioned in the discussion in section 3.1.2, field staff prefers technical assistance to enforcement, especially when options are particularly expensive or when acceptable alternatives are not readily available. Technical assistance is the preferred method to bring systems back into compliance or prepare systems to meet upcoming requirements. As a result, the Drinking Water Program has needed to refer only eight systems to enforcement for DEQ orders. The cases include construction without a permit, chronic monitoring violations, and failure to take appropriate measures after losing pressure in the distribution system. The systems with the violations are primarily small privately-owned systems and very small municipally-owned systems, none of which are new systems.

Meeting the new arsenic standard has been particularly difficult for small water systems that currently do not treat their water. Some water systems will not comply by the deadline primarily because they do not have the funds to remove the arsenic. Instead of levying fines on systems that are striving to comply, the WB is working with these systems to bring them into compliance as quickly as possible. Systems that are making good faith efforts towards meeting the arsenic standard may enter into an ACO to complete milestones on a mutually agreed schedule. To date, 19 CWS and approximately 40 NTNCWS have entered into ACOs. Several other systems are currently reviewing draft orders and are expected to enter by the end of the year to avoid penalties.

Public ownership of water systems is preferred over private ownership. However, private ownership is unavoidable in some locations. Privately-owned new community water systems are subject to additional requirements to ensure they are able to provide an adequate supply of drinking water. Proposed systems must enter into an ACO and agree to the requirements, such as a local government's refusal to accept ownership of the system, establishment of an escrow account available to the WB for immediate repair or maintenance of the system, and approval to transfer ownership. The order ensures private owners understand their responsibilities prior to establishing the water system.

3.1.10 Electronic Reporting

Target Audience: CWS primarily, though some elements are designed for laboratories that also service NCWS, and other elements are designed for those entities submitting applications for construction permits

Two new electronic reporting systems are coming online to provide more convenience to water systems and more accurate and complete assessment of capacity.

Michigan has recently implemented an Internet-based reporting system for discharge monitoring reports. The system's success prompted Michigan to expand the project to include eDWR. The eDWR system will provide for online submittal of drinking water laboratory results and treatment plant operational data. Participation is voluntary, and a water system may choose at any time to no longer participate. To date approximately 15 water systems and drinking water laboratories have volunteered to participate in the system pilot that is expected to begin in early FY 2006. Laboratory and operational data will be transferred into tracking systems for analysis and compliance determination. The collection of data will allow the WB to query certain parameters to assess capacity on a systemwide basis. Future plans include providing other required reports online.

During FY 2005, Michigan implemented the Michigan Timely Application and Permitting Service (MiTAPS). This system allows customers to prepare and submit various permit applications online, including permit applications for CWS. The purpose of MiTAPS is to provide quick receipt of applications, allow customers to track application status, and to issue electronic copies of approved permits. The drinking water application came online during December 2005. So far, one CWS has submitted permit applications online. Currently there are no further plans to expand this project for CWS purposes, although various other environmental permit applications are expected.

3.2 *Identify Systems in Need*

The strategy used to select and prioritize systems for assistance is outlined in the *Capacity Development Strategy for Existing Public Water Systems*, dated August 1, 2000. Briefly, the WB looks at all of the following criteria:

- Compliance information
- Sanitary surveys and results of surveillance visits
- Construction permit bans and correspondence from the WB addressing potential bans
- Operation and maintenance concerns
- Field staff input

The sanitary surveys and surveillance visits are ongoing and, therefore, the frequency with which systems are identified for capacity assistance is continual. Internal policy directs WB field staff to conduct sanitary surveys at CWS once per three years. Retail customer supply is excluded from these requirements as issues are expected to be addressed when visiting the parent water supply. This coincides with the requirements

of the Interim Enhanced Surface Water Treatment Rule and the proposed Ground Water Rule. The policy requires surveillance visits at the following frequencies:

Type of CWS	Smaller / Less Complex	Larger / More Complex
Wholesale customer supplies	<u>Once per three years</u> <ul style="list-style-type: none"> • <1,000 population • No treatment* or no storage/repumping facilities • No current history of water quality problems 	<u>Once per year</u> <ul style="list-style-type: none"> • >=1,000 population • With treatment* or storage/repumping facilities • Current history of water quality problems
CWS with no treatment*	<u>Once per three years</u> <50 service connections or fewer than 200 residents	<u>Once per year</u> Other CWS with no treatment*
CWS with treatment*	<u>Twice per year</u> CWS using "Limited Treatment," which includes any of the following: PO4, chlorine, fluoride, or iron removal treatment	<u>Four times per year</u> CWS using any of the following: <ul style="list-style-type: none"> • "Complete Treatment" • Surface water source • Required chlorination • Unique treatment such as nitrate or arsenic removal

* Treatment employed for public health protection. Excludes water softeners, iron removal filters, or other aesthetic treatment means.

3.3 Identify Needs and Provide Assistance

Discussions were held to determine appropriate uses of funds in anticipation of an expiring water system assistance contract. It was decided that three areas could be enhanced by awarding the two contracts discussed in section 3.1.6.

- Arsenic compliance: On-site visits and pilot projects to develop arsenic reduction strategies and tools will complement the enforcement effort to enter into ACOs with systems with high arsenic levels.
- Continued training for LHD and NCWS: This training uses existing models developed under previous contracts. Maintaining consistency in the NCWS Program implementation across 43 LHD is a huge challenge for the WB. Repeated training for the LHD helps maintain consistency. In NCWS, the very high turnover rate of staff emphasizes the need for frequent opportunities for training.
- Small system managers and financial officials training: Due to the transitory nature of municipal board and council positions, it was decided that targeting these decision makers could benefit small systems. The operator certification program is well developed with quality training on a variety of subjects targeting operators, who are required to attend training to maintain their certifications. However, no requirements exist for managers and local officials to be knowledgeable in water systems or setting policy that affects water systems. It is hoped this training will be well received and sought after by local units of government.

3.4 Review Implementation and Address Findings

No formal review of implementation was conducted.

3.5 *Modify Strategy*

The strategy remained unchanged during the reporting period. The DEQ is continuing to implement the original strategy of moving from capacity assessment through assistance to development.

4.0 Summary

Michigan is continuing to implement a program for new systems and a strategy for existing systems as set forth in May and August of 2000, respectively. The new systems program retains the legal authority and the control points established in 2000. A list of new systems in the last three years is included in this report and indicates which systems have appeared on an SNC list during those years.

The strategy for existing systems established in 2000 has remained the same though the specific tools and activities used to implement the strategy have been added, removed, or altered as needed. The Drinking Water Program continually identifies systems in need of capacity development through the sanitary survey process. During the reporting period, resources became available due to an expiring contract and discussions were held to determine what areas in the capacity development efforts could be created or enhanced. A review of implementation of the strategy did not occur during the reporting period.

Appendix A: List of New Systems

**New CWS
FY 2003 through FY 2005**

PWSID ¹ MI00... ²	CWS Name	FY Added to SDWIS/Fed ³	SDWIS/S ⁴ Active Date	SNC ⁵
00575	BELLE OAKES ASSISTED LIVING CENTER	2004	07/02/03	
00894	BROOK OF HOUGHTON LAKE INDEPENDENT LIVING CENTER		08/03/05	
01718	DANSVILLE, VILLAGE OF	2003	12/13/02	
01915	DUVERNAY PARK APARTMENTS	2004	11/20/03	
02360	FORESTVILLE, VILLAGE OF		12/14/04	
02982	HANDY TOWNSHIP - RED CEDARS CONDO	2005	03/01/05	
03724	LAKE MICHIGAN HILLS GOLF CLUB CONDOMINIUMS		09/20/05	
03752	LAKESIDE DEVELOPMENT		11/01/02	
03829	LEELANAU COUNTY LAW ENFORCEMENT CENTER	2005	01/29/04	
04595	MYSTIC RIDGE CONDOMINIUMS	2004	04/26/04	
04935	OGEMAW TOWNSHIP		08/19/05	
05033	HUNTMORE ESTATES ORE CREEK ESTATES		09/08/05	
05229	PENINSULA, THE	2005	07/01/04	
05543	POSEN, VILLAGE OF	2004	09/26/03	
06026	PORT SHELDON TOWNSHIP - EAST		07/14/05	
06074	SISTERS OF MARY, MOTHER OF THE EUCHARIST	2003	04/03/03	
06431	STONEY CREEK VILLAGE APT	2005	11/15/04	
06568	MANCELONA AREA WSA - THE CHIEF		05/10/04	
07057	WEST TRAVERSE TWP		05/16/05	
07101	WHITMORE LAKE APARTMENTS	2003	11/27/02	
07126	WINDJAMMER COVE CONDOMINIUMS	2005	06/09/05	
40678	COURTLAND CROSSINGS	2003	10/25/02	
40679	CIDERMILL CROSSINGS	2004	10/15/02	
40680	WOODFIELD MHC	2004	06/07/04	
40681	ALTO MEADOWS	2004	11/18/03	
40682	HIDDEN CREEK ESTATES	2004	12/17/03	

¹ Public Water System Identification Number (PWSID)

² Add "Michigan 000" (MI000...) before the number listed in the column below for the PWSID

³ State Drinking Water Information System/Federal (SDWIS/Fed)

⁴ SDWIS State (SDWIS/S)

⁵ No CWS was on a SNC list in FY 2003 through 2005.

**New NTNCWS
FY 2003 through FY 2005**

PWSID	NTNCWS Name	FY Added to SDWIS/Fed	Michigan Inventory Add Date	SNC
MI0420148	RA TOWNSEND COMPANY	2005	3/9/2005	Yes
MI0620212	WEE WESLEYAN LEARNING CTR./STERLING WESLEYAN	2005	1/18/2005	
MI0720052	FORD FORESTRY CENTER	2005	10/4/2004	
MI0820386	HOSPITAL PURCHASING SERVICE	2003	4/8/2003	
MI0820389	SUPERIOR CORN PRODUCTS	2005	10/1/2004	
MI1120706	TWIXWOOD (SHAWNEE)	2003	10/3/2002	
MI1320409	HALF PINT ACADEMY,LLC	2005	11/10/2004	
MI1520185	BLUE GREEN OFFICE	2003	3/13/2003	
MI1620441	CHEBOYGAN COUNTY RD. COMMISSION	2005	12/30/2004	
MI1720547	MAPLEWOOD BAPTIST ACADEMY	2004	9/16/2003	Yes
MI1920579	EAGLE LEDGES INDUSTRIAL PARK	2005	2/16/2005	Yes
MI2120208	MID-PEN HEADSTART	2003	2/5/2003	
MI2320288	AUTOMOTIVE FACILITY	2005	4/12/2005	
MI2420332	PELLSTON REGIONAL AIRPORT	2005	4/30/2004	
MI2420346	PRESTON FEATHER BUILDING CENTER	2005	5/23/2005	
MI2521551	GOODRICH MIDDLE SCHOOL	2003	10/16/2002	
MI2521562	LAKE FENTON HIGH SCHOOL	2005	10/19/2004	Yes
MI2521575	WEYI TV 25	2005	11/10/2004	Yes
MI2521578	DAVISON COUNTRY CLUB	2005	3/15/2005	
MI2620122	ROLL-RITE, LLC	2005	12/21/2004	
MI3020233	VREBAHOFF DAIRY II	2005	9/22/2004	
MI3220345	WAL-MART	2003	3/18/2003	
MI3320174	HARLAN BIO PRODUCTS FOR SCIENCE, INC.	2005	7/14/2004	
MI3320180	DELHI DEVELOPMENTAL LEARNING CENTER	2005	11/16/2004	
MI3320183	ROCKING HORSE PRESCHOOL	2005	2/8/2005	
MI3420264	HERBRUCKS POULTRY	2005	5/9/2005	
MI3620001	CRYSTAL FALLS SPRING	2005	5/18/2004	
MI3820800	JACKSON COUNTY ROAD COMMISSION	2003	11/15/2002	
MI3820801	RTD MANUFACTURING, INC.	2003	11/15/2002	
MI3820812	ABSOPURE #3 - WM YOUNG	2005	6/8/2004	
MI3920457	CHERISH THE CHILDREN	2004	9/19/2003	
MI4120921	MURRAY LAKE ELEMENTARY	2005	7/27/2004	Yes
MI4420577	LITTLE EINSTEIN'S CHILD DEVELOPMENT/PROF. BLD	2005	7/2/2004	
MI4421690	MAPLE GROVE ELEMENTARY	2005	7/8/2005	
MI4620641	B & B CHILD CARE CENTER	2005	5/17/2004	Yes
MI4620643	HERITAGE PLAZA	2005	10/14/2004	
MI4620644	UNDERWOOD CHEVROLET	2005	11/2/2004	
MI4620647	COMCAST CABLE	2005	6/28/2005	
MI4720402	MAPLE MONTESSORI SCHOOL	2003	6/20/2003	

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PWSID	NTNCWS Name	FY Added to SDWIS/Fed	Michigan Inventory Add Date	SNC
MI4720888	METROPOLITAN TITLE	2004	8/5/2003	
MI4720904	HARTLAND HIGH SCHOOL (NEW)	2003	10/4/2002	
MI4920671	CEDAR COVE MANOR	2005	7/12/2005	
MI5020343	MOUNTAINTOP CHURCH	2004	11/13/2003	
MI5020353	AUTOMOTIVE SYSTEMS LAB	2005	9/28/2004	
MI5020357	CPMK INC - CENTURY 21 AND LIFE SKILLS	2005	4/23/2004	Yes
MI5220191	TEACHING FAMILY HOME OF UPPER MICHIGAN	2005	5/18/2004	
MI5420392	GREAT SPRINGS OF AMERICA	2003	1/27/2003	
MI5420393	GREAT SPRINGS OF AMERICA	2003	1/27/2003	
MI5520208	PERKINS HEADSTART	2003	12/6/2002	
MI5620082	THREE RIVERS CORP PIPE SHOP	2005	6/30/2005	
MI5920567	GRATTON ACADEMY	2005	6/15/2004	Yes
MI5920577	CYRSTAL HEAD START	2005	11/22/2004	
MI6120423	WINTERS SUN PRESCHOOL	2003	11/26/2002	
MI6120428	PENNSYLVANIA SCHOOL	2003	4/29/2003	Yes
MI6120441	THE HOP DAYCARE	2005	4/29/2005	
MI6322753	SPRINGFIELD TOWN SQUARE	2005	6/7/2004	Yes
MI6322802	OAK HILL CORNERS	2004	9/12/2003	
MI6322822	SOTA TECHNOLOGY	2005	2/18/2005	Yes
MI6322825	HARDY ELEMENTARY	2005	9/1/2004	
MI6322826	REBECCA'S LEARNING CENTER	2005	2/18/2005	
MI6322829	ALWAYS UNIQUE CHILDCARE & PRESCHOOL	2005	1/21/2005	
MI6420289	PETERSON FARMS	2005	8/19/2004	Yes
MI6520287	DEAN ARBOUR FORD	2004	8/21/2003	
MI6520293	CHIPPS & NICHOLS IGA	2005	2/7/2005	
MI6520294	KIDS CORNER DAY CARE	2005	4/12/2005	Yes
MI6720173	DAY STAR ACADEMY	2005	8/19/2004	
MI7020605	DEWITT BARRELS, INC.	2004	10/9/2003	
MI7020620	LINCOLN MERCURY DEALERSHIP	2005	7/6/2005	
MI7120167	LNA/PRESQUE ISLE QUARRY	2003	12/20/2002	
MI7220411	COMFORT SUITES	2005	4/29/2004	
MI7220412	SUPER WAL-MART	2005	4/29/2004	
MI7320195	TRINITY UNITED METHODIST CHURCH	2005	1/25/2005	
MI7520242	AFFINITY CUSTOM MOLDING	2004	7/28/2003	
MI7520243	COUNTRY KIDS DAYCARE	2005	9/2/2004	
MI7820360	APPLEBEE'S	2005	4/18/2005	
MI7820362	OWOSSO MEDICAL PARK BUILDING 200	2005	6/9/2005	
MI8020536	FOUROOST DEVELOPMENT	2005	7/6/2005	
MI8120490	SPIRITUS SANCTUS ACADEMY	2005	10/17/2002	
MI8120531	ANN ARBOR CHRISTIAN SCHOOL	2005	2/10/2005	
MI8120533	INDEPENDENT ENGINEERING LABORATORIES	2005	8/24/2004	

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PWSID	NTNCWS Name	FY Added to SDWIS/Fed	Michigan Inventory Add Date	SNC
MI8120551	PRECIOUS ONES DAYCARE	2005	5/19/2005	

Appendix B: Outline of a Typical Financial Assessment and Financial Action Plan

Financial Assessment

Introduction: Population, location, transportation routes, and community characteristics; description of the water system and major projects or concerns such as expansion, securing loans, and meeting new drinking water standards; and major financial shortfall such as the need for a rate methodology.

Requested Information: Budget, last two years of audited records, water use and water rate ordinances, latest rate ordinance or resolution, recent rate or feasibility study, and contract or service agreements with outside customers.

Submitted Information: Supply usually does not provide all the information requested.

Analysis: Summary or highlights of each of the documents provided by the supply.

On-site Meeting: Date and attendees; and list of items discussed, such as the financial concerns, the billing method, and major recent projects.

FAP

Goal One: Develop the financial capability to fund present and future needs.

Task 1: Develop a capital improvement projects plan.

Step 1: List anticipated water projects.

Step 2: Estimate the cost of each project to be funded.

Step 3: Project the anticipated date the project is to begin.

Step 4: Calculate the dollar amount necessary to be set aside annually.

Step 5: Establish a line item in the budget for capital improvement expenditures.

Task 2: Develop and implement a rate setting methodology.

Step 1: Identify water system expenses.

Step 2: Identify replacement expenses and fund the replacement account.

Goal Two: Establish the legal and managerial capability to protect the water system.

Task 1: Develop a penalties section in the water ordinance.

Task 2: Adopt the amendment to the ordinance.

Tools Included With FAP

Sample resolution, sample water use and rate ordinance, service agreement checklist, DWRF informational brochure, project plan preparation guide, and securing a DWRF loan fact sheet.