

Michigan Department of Environment, Great Lakes, and Energy
Drinking Water and Environmental Health Division

ANNUAL REPORT ON CAPACITY DEVELOPMENT PROGRAM

FISCAL YEAR 2022

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[Michigan.gov/EGLE](https://www.michigan.gov/EGLE)

List of Acronyms

ACO	Administrative Consent Order
Act 399	Michigan Safe Drinking Water Act, 1976 PA 399, as amended
ALE	Action Level Exceedance
AWIA	America’s Water Infrastructure Act
AMP	Asset Management Plan
ASDWA	Association of State Drinking Water Administrators
AWOP	Area-Wide Optimization Program
AWWA	American Water Works Association
CEC	Continuing Education Credit
CCR	Consumer Confidence Report
CDP	Capacity Development Program
CWS	Community Water Supply
DSMI	Distribution System Materials Inventory
DWEHD	Drinking Water and Environmental Health Division
DWGIS	Drinking Water Geographic Information System
DWRF	Drinking Water Revolving Fund
DWSRF	Drinking Water State Revolving Fund
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EFCN	Environmental Finance Center Network
EN	Enforcement Notice
ETT	Enforcement Tracking Tool
FY	Fiscal Year
LCR	Lead and Copper Rule
LHD	Local Health Department
LSL	Lead Service Line
MCL	Maximum Contaminant Level
MDHHS	Michigan Department of Health and Human Services
MEHA	Michigan Environmental Health Association
MPART	Michigan PFAS Action Response Team
MRWA	Michigan Rural Water Association
MOR	Monthly Operation Report
NCWS	Noncommunity Water Supply
NTNCWS	Nontransient Noncommunity Water Supply
OTCU	Operator Training and Certification Unit
PFAS	Per- and Polyfluoroalkyl Substances
PWS	Public Water Supply
RCAP	Rural Community Assistance Program
RTCR	Revised Total Coliform Rule
SDWA	Federal Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SWIPP	Surface Water Intake Protection Program
TA	Technical Assistance
TMF	Technical, Managerial, and Financial
USEPA	United States Environmental Protection Agency
WHPA	Wellhead Protection Area
WHPP	Wellhead Protection Program

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1. Introduction

The 1996 Amendments to the federal SDWA added provisions for each state to develop a CDP. The objective of the CDP is to enhance public health protection by helping water supplies develop and maintain the 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 USEPA that the State of Michigan is implementing a capacity development strategy as required in the SDWA, Section 1420(c)(1)(C), or risk losing 20 percent of the annual 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's memo "Reporting Criteria for Annual State Capacity Development Program Implementation Reports," dated June 1, 2005. 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 that ends on September 30; therefore, this report is due by December 31 of each year. Elements discussed in this report are:

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

2. New Systems Program

2.1 Identify Legal Authority

The legal authority remained unchanged during the reporting period. The CDP is implemented by EGLE, DWEHD, through amendments to Act 399, by application of capacity development policies and guidance documents, and through cooperation and partnerships with other agencies.

2.2 Identify Control Points

The control points remained unchanged during the reporting period. As outlined in the [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, which are required by law, and final inspection, which is required by policy. Generally, a construction permit is issued based on the technical capacity of the proposed system. For CWSs, 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 operations plan that addresses financial and managerial capacity. For NTNCWSs, the DWEHD has delegated authority to LHDs to review, approve, and issue construction permits. When water supplies begin the permit application process, the LHD helps them outline their TMF capacity. Prior to receiving approval to commence operation, the NTNCWS must submit both a TMF and a contingency plan, as well as designate a certified operator.

2.3 List of New Supplies

The list of CWSs and NTNCWSs that became active during the last three fiscal years is in Appendix A. Each year, the list indicates which supplies, if any, scored 11 or more (indicator of noncompliance) on the ETT during the reporting period. New supply compliance data is more meaningful when compared to all supplies of the same classification, as summarized in Table I below.

Table I. New and Existing Water CWSs and NTNCWSs on the ETT

FY 2020 to FY 2022	CWS		NTNCWS	
	New	New and Existing	New	New and Existing
Number of supplies on ETT Report	9	1,376	5	1,261
Number of supplies with ETT score of 11 or more	0	11	0	39
Percent of supplies with ETT score of 11 or more	0%	0.8%	0%	3.1%

No new CWS or NTNCWS scored an 11 or higher in FY 2020 – FY 2022.

3. Existing Systems Program 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 supplies 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 Sanitary Surveys to Evaluate Supplies

Target: CWSs and NTNCWSs

Capacity of existing supplies is assessed through sanitary surveys, on-site surveillance visits, and the construction permit process.

For NTNCWSs, sanitary surveys are conducted every five years. Surveillance visits are required annually for any supply with regulated treatment or that is on a reduced (annual) total coliform sampling schedule. Construction permits and inspections are required when new wells are installed, or treatment is added. While a change in classification from transient to NTNCWS results in a capacity assessment of the existing system, these supplies are not included in the list of new supplies in Appendix A.

The frequency of NTNCWS surveillance visits is as follows:

Table II. Frequency of NTNCWS surveillance visits

Type of NTNCWS	Site Visit Frequency	Sanitary Survey Frequency
Supply with regulated treatment	Once per year	Every 5 years
Supply with annual total coliform	Once per year	Every 5 years
Supply without regulated treatment and on quarterly or monthly total coliform monitoring	No visit beyond sanitary survey	Every 5 years

Table III. Number of NTNCWS Evaluations and Visits from FY 2020 – FY 2022

Evaluations and Visits	FY 2020	FY 2021	FY 2022
Sanitary Surveys Conducted	274	298	277
Annual Treatment Surveillance Site Visits	241	254	257
Significant deficiencies	12 at 12 supplies	4 at 2 supplies	11 at 11 supplies

For CWSs, sanitary surveys are conducted every three years by DWEHD field staff. This frequency coincides with the requirements of the series of Surface Water Treatment Rules and the Ground Water Rule. Each of the eight required sanitary survey components is rated individually and tracked in SDWIS/State.

The required components of a sanitary survey include the source, treatment, distribution system, finished water storage, pumps and controls, monitoring and reporting, supply management and operation, and operator compliance. Each component may be rated as a significant deficiency, minor deficiency, recommendations made, or no deficiencies/recommendations.

DWEHD staff detail their findings, recommendations, and deficiencies in a letter to the supply. These letters include a list of dates by which the items are expected to be addressed. Options for capacity assistance may also be offered, such as recommending a financial assessment or contacting available TA providers for specific assistance. The sanitary survey letter helps the supply understand the severity of any deficiencies and prioritization of response activities.

Table IV below summarizes data on CWS sanitary surveys, visits, and construction permits in recent years.

Table IV. Number of CWS Sanitary Surveys, Visits, and Construction Permits for FY 2020 – FY 2022*

	FY 2020	FY 2021	FY 2022
Sanitary Surveys Conducted	371	448	349
Significant Deficiencies	35 at 30 supplies	49 at 39 supplies	48 at 32 supplies
Minor Deficiencies	522	668	567
Visits**	1540	1428	1355
Construction Permits Issued	916	1048	967

*Data in the table is updated annually; data may differ from previous years reports based on late entries into databases.

**Includes sanitary surveys, TA visits, level 2 assessments, construction inspections, etc.

The decrease in the number of sanitary surveys, visits, and construction permits issued in FY 2022 is due to a combination of staffing constraints, an increase in complex enforcement cases and responses to drinking water concerns, a large number of complex construction permits, and other projects within the division. Although a large number of positions were filled, the total number of staff decreased in FY 2022 compared to FY 2021. This is due to many of the positions being filled internally leaving more positions open. In addition, a significant amount of time was spent training new staff. Hiring efforts will continue in FY 2023 and management hopes to increase the total number of staff in the division to better match the workload.

In addition to sanitary surveys, DWEHD staff perform routine visits to CWSs at a variety of intervals based on the type of supply. The purpose of these visits is to continue to build relationships between EGLE and the CWSs, as well as to ensure that supplies are not experiencing problems between the sanitary survey visits. The table below shows the targeted frequency of CWS surveillance visits.

Table V. Targeted Frequency of CWS Surveillance Visits

Type of CWS	Less Complex	More Complex
Wholesale customer suppliers	Once per year	Once per year
CWS with no treatment*	Once per year	Once per year
CWS with treatment*	Twice per year for supplies employing treatment other than “complete treatment”	Four times per year for supplies employing “complete treatment”

*Treatment employed for public health protection. Excludes water softeners or other point of entry aesthetic treatment.

3.2 One-on-One TA and Consultation

Target: CWSs and NTNCWSs

DWEHD and LHD field staff are the primary implementers of the CDP. Water supply operators work with field staff who are the primary contact for capacity development. Each CWS is served by DWEHD staff located in one of eight district offices, and each NTNCWS is served by staff from one of the 44 LHDs under contract with EGLE. DWEHD and LHD field staff provide continual oversight throughout the permit process to help ensure new supplies can achieve capacity development requirements upon activation. Assistance is typically provided through site visits, meetings, training events, phone consultations, or via e-mail. DWEHD field staff attends, participates, and presents at periodic regional operator meetings to discuss upcoming regulations, regional issues, and to network with operators and managers.

DWEHD NCWS Program staff maintain communication with each of the 44 LHDs during the year. This communication occurs routinely via phone calls, e-mail, joint office and field work, and trainings. Also, quarterly data reviews and annual evaluations of each of the 44 LHDs’ performance are conducted to help maintain water supply compliance.

For CWS and NCWS staff to provide complete and accurate TA to water supplies, the DWEHD is committed to staff training. This includes both the DWEHD Rule School, as well as quarterly analyst and engineer meetings where they discuss compliance issues, rules, and enforcement to promote consistency and enhance knowledge. The DWEHD Rule School, an internal division-wide training program that has been ongoing since FY 2016, is a series of training sessions focused on details of the Act 399 Administrative Rules and related topics. Four Rule School sessions were held during FY 2022, and attendance was required for all CWS technical staff. A variety of topics were taught by DWEHD staff as well as EGLE staff from other divisions.

Topics for FY 2022 included:

- Chlorination
- Emergency Preparedness and Response
- American Water Infrastructure Act (AWIA)
- Superfund Amendments and Reauthorization Act (SARA) Title III
- Mobile Home Parks and Privately-owned supplies
- Operator Training and Certification Overview
- Classification of Water Supplies
- Well Abandonment and Plugging
- Test Well Construction and Well Plugging
- Waived Contaminant Sampling Survey
- Subdivision Plan Review
- DWEHD Division Overview
- PWS Program Funding, Activities, and Commitments
- CWS Annual Reporting (LSL, Cross Connection, Pumpage)

Sessions included a brief history, the importance of the regulation, DWEHD staff responsibilities, rule citations, policies related to the rule, and requirements related to monitoring and reporting. The technical knowledge gained through these training sessions will help staff explain regulations to water supplies in a clear and concise manner. The DWEHD will continue to provide training to staff via Rule School sessions in FY 2023.

The following examples illustrate how the PWS Program staff provided TA to water supplies during FY 2022:

- EGLE DWEHD staff assisted a small CWS where aesthetic treatment was presumed to increase corrosivity, resulting in a lead ALE. DWEHD staff worked with the supply to evaluate water quality, treatment objectives, and lead and copper monitoring requirements. Furthermore, DWEHD staff assisted the supply with public education and consumer notice.
- EGLE and the water supply staff from a small Type I water supply continue to work with the RCAP to provide project management for installation of two new wells and a distribution system to address an ACO. The supply was previously classified as a NCWS and had individual wells at each building, along with buried pressure tanks, and lacked required appurtenances. The RCAP has assisted in developing deadlines, brought in design engineers, and been the main point of contact for the project.
- EGLE staff worked with a small supply to address several issues with their source water wells. The supply is looking for a suitable replacement water source as their current wells have frequent fouling issues. They have had

studies done by engineering firms and were looking at the feasibility of using one of the proposed locations or switching to a surface water source. Village staff are unsure what path to take. CWS program staff met with the village on multiple occasions to discuss their options. In addition, there are concerns about their current wells being impacted or influenced by surface water from a nearby river. EGLE staff are continuing to work with supply to help them make a financially and technically feasible decision regarding their source water.

- Continued support and TA were provided to the cities of Flint and Benton Harbor, including working with Flint during a full system treatment change over. Flint safely and effectively made the transfer from one water supply to another, then back again with minimal to no effect on the distribution system and its customers. This proved exceedingly useful and crucial during a recent 120-inch transmission main break that forced them to switch water supplies.
- LHD staff, in conjunction with EGLE's NCWS Unit, discovered a day care center with elevated levels of PFAS in their drinking water. Due to a PFAS contaminated aquifer and local geology limitations, staff determined that replacement of the water supply was unlikely to result in a source free of PFAS. EGLE issued a significant deficiency and, through an ACO and the execution of a Drinking Water Contaminant Remediation grant, a treatment system was installed. The day care center is now able to provide water that meets PFAS drinking water standards.

In addition to one-on-one TA provided by EGLE staff and LHDs, the MDHHS Oral Health Program also provides TA to promote fluoridation in water supplies. The Oral Health Program administers a Fluoride Grant Program which offers grants to water supplies wishing to purchase new or replacement fluoride feed equipment. In FY 2022 three water supplies serving a total population of 23,204 were awarded grants totaling \$15,667.54. In addition, staff from the MDHHS worked with the city of Ironwood to get them ready to apply to the Delta Dental Foundation for funding to add fluoridation to their new water treatment plant.

These examples are only a few instances of the one-on-one TA provided by staff to help water supplies gain and maintain TMF capacity.

3.3 Other PWS Program Efforts

PWS Program staff (DWEHD for CWSs and LHD staff for NTNCWSs) develop and distribute individual monitoring schedules to each CWS and NTNCWS as a tool to help supplies comply with monitoring and reporting requirements. To supplement the schedule, additional information and reminders may be included, such as links to forms, annual reporting reminders, sampling instructions, and links to other helpful resources.

Methods and additional opportunities to communicate PWS monitoring and reporting requirements include:

- Efforts to remind water supplies of reporting deadlines.
- Monitoring schedule reminders. CWSs that have not completed their required distribution or entry point monitoring typically receive a reminder within 30 to 90 days before the deadline to prevent a violation.
- Lead and copper monitoring reminder letters. Due to the complexity associated with lead and copper sampling, additional guidance is provided within the notification.
- Lead and copper 90th percentile letter or ALE letters. These letters outline the results of the supply's monitoring and remind supplies of further requirements, such as distributing the *Consumer Notice of Lead and Copper Results*, conducting water quality monitoring, or installing corrosion control treatment.
- CCR reminder letters. A letter is provided each year reminding supplies of the annual requirement to distribute the CCR by July 1. CCR guidance and resources to help comply are included.
- Communicate with water supplies on sample results that cannot be used for compliance due to issues identified by the associated laboratory such as exceeds hold time, does not meet thermal preservation, bottle broke in transit, etc. These efforts are to help provide an opportunity so a new sample can be collected before the end of the monitoring period.

Examples of tools to help supplies manage operational requirements include:

- MOR templates. Staff review MORs for compliance with treatment techniques and to evaluate treatment processes.
- MOR Excel Tool for Operators. This is a tool staff created to assist supplies with calculations and conversions to help them accurately complete their MORs.
- [*Privately-owned CWS Stipulation to Conditions*](#). While it is clear in the administrative rules that new supplies must demonstrate TMF capacity before commencing operation, the 2009 amendments to Act 399 clarified that these requirements also apply to new owners of existing supplies. The stipulation to conditions, which owners must sign, covers the minimum elements to ensure owners are aware of the requirements and have the ability to provide an adequate supply of drinking water. This form was updated in FY 2022 to make it easier for supplies to complete.
- Water well site inspections and approvals. LHD and DWEHD field staff conduct inspections and approvals for water wells serving NTNCWSs and CWSs, respectively.

- Guidance documents. DWEHD staff develops and distributes guidance materials as needed. Examples include:
 - *Water Well Disinfection Manual*
 - *Seasonal Public Groundwater Supply Handbook (May 2020)*.
 - *Suggested Practices* outlines program requirements.
 - *New Community Water System Capacity Guideline Document*, developed in 2000, guides staff and owners of proposed or new supplies through the process.
 - Source water protection guidance documents.
 - NCWS Program guidance documents include the *Noncommunity Staff Reference Manual* and the *WaterTrack Operators Manual* for LHD staff. An updated version of the NCWS manual is distributed to LHDs annually.
 - Drinking Water Study Guides for Community Water Supply Operators (Level 1-4)
 - The *Level 5 Drinking Water Operators Guide* for those individuals pursuing certification to operate a small PWS.
 - Additional brochures and informational publications were produced to address the issue of lead and copper in household drinking water.
 - Sample collection guidance.
 - Instructional videos.
- USEPA tools. In addition to state-developed products, field staff distributes, as needed, USEPA tools and guidance documents, promotes capacity development and sustainability tools, and promotes USEPA webinars.
- PWS staff presented material at meetings, conferences, and training sessions throughout the year for LHD field staff, consulting engineers, operators, and local decision-makers.
- The DWEHD continued to conduct routine webinars to communicate and support CWSs on program updates such as cybersecurity, new drinking regulatory requirements, and other emerging issues.

Ongoing activities include serving as instructors at several operator training courses throughout the year, speaking at other meetings and conferences related to drinking water, and attending USEPA-sponsored webinars. Specific activities in FY 2022 included:

- DWEHD staff presented the EGLE Update at the Michigan Section, AWWA regional meetings. The division director also presented the EGLE Update at the annual conference of the Michigan Section, AWWA.
- EGLE contributes to a quarterly newsletter, *Water Works News*, published by the Michigan Section, AWWA. The newsletter is distributed to members and all CWSs.

- NCWS Program staff participate in association conferences relevant to NTNCWSs, such as the Michigan Chapter of the Association of Recreational Vehicles and Campgrounds, the Michigan School Business Officials, and the Michigan Association of Local Environmental Health Administrators.
- The DWEHD also takes advantage of USEPA and AWWA webinars. Certified operators can meet continuing education requirements with USEPA- or AWWA-sponsored webcasts. The DWEHD promotes webinars and encourages staff to forward information to water supplies.
- DWEHD staff attended the USEPA Small System Workshop virtually in September 2022 which focuses on treatment and emerging issues for small CWSs and NCWSs.
- DWEHD staff hosted six LCR trainings in FY 2022 to continue to inform water supplies about the requirements of the Michigan LCR.
- Region 5 LCR/Optimal Corrosion Control Techniques Workgroup Calls.
- Region 5 Capacity Development and Operator Certification Quarterly Meetings.
- DWEHD staff attended the 6th National Capacity Development and Operator Certification Workshop in August 2022.

In FY 2022 EGLE continued its efforts to promote quality drinking water in schools that receive their water from CWSs with the Healthy Water Healthy Kids Initiative.

The Healthy Water Healthy Kids Initiative utilized the Lead Testing in School and Child Care Program Drinking Water Grant from the Water Infrastructure Improvements for the Nation Act to conduct drinking water plumbing assessments, water management and sampling plans, lead testing, training, and guidance for schools and childcare facilities. Seventy-nine eligible facilities volunteered, and 3,439 samples have been tested.

The DWEHD continued to promote videos that offer additional training and guidance to drinking water owners, operators, and staff. Current videos include:

- PFAS sampling
- Packing and Shipping for Thermal Preservation
- CCR Basics
- Increasing Readability of CCRs
- ROCR Sample Siting Plans
- LCR Sampling Plan Overview
- LCR How to Complete the Sampling Plan Form
- LCR DSMI Overview
- LCR How to Complete the DSMI Form
- Lead and Copper Sampling Instructions

- OTCU Exam Application Instruction video
- Back to Basics Well Construction Training video series

Development of new videos will continue as needed.

3.4 Enforcement

Target: CWSs and NTNCWSs

Sanitary surveys and compliance information become the basis for enforcement. When a supply violates a requirement, they receive a letter that states what was violated, when the violation occurred, how to return to compliance, and when a response to the letter is required. It is believed that enforcement will be viewed as more predictable if the supply better understands the cause of the violation and how to prevent it. In the long run, this may result in supplies making a greater effort to comply with requirements and avoid enforcement.

Administrative fines provide a tool to help promote compliance with drinking water standards and/or monitoring and reporting requirements. During FY 2022, 37 CWSs received a fine for one or more monitoring or reporting violation(s), including violations for CCRs, MORs, and monitoring/reporting of compliance sample data. In addition, three CWSs received a fine for failing to distribute a Tier 2 Public Notification by the required deadline. Small supplies received the majority of the fines, which is expected as large supplies typically have resources in place to ensure monitoring is timely and correctly performed.

When a fine is not applicable or does not prevent further violations, the DWEHD moves to an escalating series of enforcement actions that may include an EN, ACO, and, in rare cases, an EGLE Order or referrals to the Michigan Department of Attorney General or the USEPA. Copies of ENs may be provided to other associated regulatory agencies, including the MDHHS, the Michigan Department of Licensing and Regulatory Affairs, and the Michigan Department of Agriculture and Rural Development. To ensure consistency across the state all ACOs are developed and sent by enforcement staff in Lansing, with assistance from district staff. The DWEHD entered into eight ACOs with CWSs and three ACOs with NTNCWSs in FY 2022.

In addition to the formal avenues listed above, three CWSs, the cities of Flint, Benton Harbor, and Kalamazoo, were directed to conduct TMF studies to address compliance and operational concerns. Both the cities of Flint and Kalamazoo completed their TMF studies, and staff are monitoring to ensure they are following the results of the studies. Benton Harbor has been granted an extension until March 2023 to complete their TMF study.

Under the provisions of the contract to implement the NCWS Program, each LHD is required to conduct enforcement necessary to address NTNCWSs in noncompliance. DWEHD field staff assist LHDs upon request and, in extreme cases, DWEHD central staff may take the enforcement lead or refer it to the USEPA, Region 5, when state resources are unavailable.

Typical tools used by LHDs include administrative fines, informal hearings, local license suspension procedures, and bilateral compliance agreements. In total 23 fines were issued across 13 NTNCWSs in FY 2022.

3.5 OTCU

Target: CWSs and NCWSs

A properly certified operator must be designated for each of the 1,381 CWSs; 1,261 NTNCWSs; and at the 79 transient NCWSs that employ treatment for either public health purposes or aesthetic reasons. Operators maintain their certification by meeting continuing education requirements through training offered in a variety of venues.

3.5.1 Training

The OTCU, with support from the DWEHD, provided over 40 separate training sessions in FY 2022. Training course topics included: Water Math Basics, Principals of Basic Chemistry, CCRs, Distribution Short Course, Limited Treatment Short Course, RTCR, Basic Cross Connections, and Surface Water Treatment series. Training sessions were offered in both virtual and in-person formats.

In addition to EGLE trainings, the OTCU approves CECs for nearly 80 organizations and training providers that offer other opportunities for continuing education, including online courses. The OTCU has also approved courses in the hands-on training or “HOT” category that can provide operators with at least 50 percent practical experience in a three or more-hour training session.

During on-site visits or other consultation opportunities, staff discuss the certification status of the operator and may suggest training sessions to hone skills or prepare for the examination required to obtain or to upgrade certification.

The OTCU works with TA providers such as the RCAP, the EFCN, and the MRWA to provide additional training and support to operators and supplies throughout the state. Staff meet at least annually with these organizations to set priorities for the upcoming year and to receive a report of prior year activities. In FY 2022 TA providers MRWA, RCAP, and EFCN offered both training and direct TA to water supplies.

- The MRWA provided training on sanitary surveys, chemical feed and disinfection, sustainability of water storage tanks and treatment filters, monitoring and sampling, cross connections, and applications of chlorine dioxide.
- The RCAP provided training sessions on standard operating procedures, distribution system water quality and lead, understanding utility financial reports, manganese and PFAS, customer satisfaction, community sustainability, SDWA, Geographic Information Systems, water main breaks and cross connections, field days, and nitrate regulations. The RCAP also provided TA to ten supplies during FY 2022.
- The EFCN provided training on financial management for small supplies. They also provided asset management assistance to one CWS.

In addition, the OTCU continued to work with course providers in FY 2022 to develop new online courses, giving operators more training opportunities than they may have otherwise had in-person. EGLE now has over 240 online courses approved for CECs for Michigan drinking water operators.

3.5.2 Small CWS and NCWS Training

Training targeted toward LHD staff is developed to inform, explain, and discuss new and updated program issues and procedures. This information is then relayed to the owners and operators of NCWSs. This training occurs in many ways, including formal educational events and during the program evaluation process. DWEHD staff conducted, along with GEC, five virtual SDWIS trainings for LHD staff in August 2022. Online and one-on-one TA with LHDs took the place of the annual conference. In August 2022 DWEHD staff hosted five virtual “small system” trainings. These trainings are marketed to all owners and operators of privately-owned community supplies with a population of 3,300 or less. Staff from the NCWS program were also in attendance to present and answer questions. In total there were over 104 attendees, which represents many more supplies as several of the attendees are “circuit rider” operators who operate more than one water supply. This year’s topics included:

- Financial Planning for Infrastructure Replacement
- PWS Compliance Tips
- SDWA Overview
- Operator Oversight
- Private Ownership Documents
- New Reporting Forms
- Sanitary Survey Common Deficiencies

The small systems trainings were recorded and are available on EGLE's Trainings and Workshops website.

3.6 DWSRF

Target: CWSs and Nonprofit NTNCWSs

The 1996 Amendments to the SDWA authorized the creation of a revolving fund to provide low-interest loans for repairs or enhancements to help water supplies comply with the SDWA. The capacity development provisions of the SDWA are funded through the DWSRF allotment.

Michigan's DWSRF is co-administered by EGLE and the Michigan Finance Authority. EGLE handles all programmatic issues, while the Michigan Finance Authority serves the DWSRF Program with its financial expertise. Prior to the creation of the DWSRF, project financing for CWSs was left largely to local units of governments or to individuals investing in their own supplies.

In FY 2022, \$225,181,558 in loan and principle forgiveness was committed to 63 projects. This brings the total since the fund's inception in 1998 to \$1.662 billion for 400 projects. Some supplies receive commitments from the DWRF but may not be ready to proceed with the project until they are able to assure the revenues will be generated to repay the loan. In these cases, the supply remains on the priority list for the next year if they so choose.

Commitments in FY 2022 included LSL replacements, water treatment plant improvements, storage rehabilitation, and water main upgrades and replacements.

Michigan's drinking water program relies heavily on proper water system design and construction to prevent jeopardizing the safety of both the source and finished water. To that end, additional priority points are given to those DWSRF projects in communities that have approved and active Source Water Protection Programs.

3.7 Source Water Protection

Supplies are continuing to take steps to protect their drinking water sources by implementing a comprehensive, multi-faceted Wellhead and Source Water Protection Program.

3.7.1 Groundwater Source Protection

Target: CWSs and NTNCWSs

Minimum isolation areas around drinking water wells are established in Part 127, Water Supply and Sewer Systems, of the Michigan Public Health Code, 1978 PA 368, as amended, and in the Act 399 administrative rules. Programs in EGLE, such as the Groundwater Discharge Permit Program and the Onsite Wastewater Program, reference these isolation distances as they review applications for discharge permits or site approvals to ensure the facility or activity will be protective of the drinking water sources. Act 399 requires that the location of the well and surrounding area be controlled and protected from potential sources of contamination.

Of the 395 municipally owned CWSs in Michigan using groundwater as their source, 277 are involved in some aspect of wellhead protection, such as performing a delineation, inventorying the potential sources of contamination, and planning for emergencies. Of those 277 systems, 96 have completed the steps to have an approved WHPP, which meets the substantial implementation standard. There was a decrease in 52 water supplies having an approved WHPP from FY 2021. This is due to water supplies not updating their source water protection plans. However, a number of these water supplies have updated their reviews and we expect to see an increase in the number of water supplies with an approved WHPP in FY 2023. An additional 129 groundwater supplies have attained substantial implementation by completion of a source water assessment with no issues identified. As a result, of the population served by a CWS using groundwater as a source, approximately 60 percent are served by a supply substantially implementing source water protection efforts.

The DWEHD Source Water Assessment Program redefined “substantial implementation,” allowing smaller supplies to obtain this source water protection status and increasing Michigan’s population that is protected by these activities. CWSs can obtain substantial implementation by using a self-assessment to identify specific risks to their drinking water sources. Once risks have been identified, corrective actions can be put in place to reduce the risk of contamination. This process allows these supplies to obtain substantial implementation as they have limited control of their WHPA as compared to municipal supplies that may have local control via land use planning and ordinances. CWSs may also achieve substantial implementation status by having a source water assessment updated and having no issues identified.

The DWGIS application has been updated to include chemistry data from the drinking water sampling database (WaterChem), geocoding (i.e., assign latitude/longitude coordinates based on street addresses) the records, and creating a file format making the data amenable to spatial display in DWGIS. This effort should provide an

extraordinarily useful tool in conducting desktop analyses of chemical occurrence in the groundwater and for comparing sites of environmental contamination with WHPAs.

To encourage and support WHPP activities, financial assistance through wellhead protection grants is available. The WHPP grant program uses a 50 percent local match to fund activities involved in protecting their PWS well capture zones (based on a ten-year time-of-travel). Grant assistance is based on the number of people served by the water supply and the number of wells the supply operates. A total of 30 source water protection grants were awarded in FY 2022 which includes both surface water and wellhead protection grants.

Since 2016, EGLE has allocated resources and training to LHDs to aid in updating source water assessments of existing and new NTNCWSs. The source water assessment is a study and report that is unique to each water supply source and is a tool to help identify vulnerability to contamination. The assessment study and report also provide an opportunity to educate owners on protecting groundwater and identifying and managing risk. In total, LHDs completed 129 source water assessments at 105 NTNCWS in FY 2022.

3.7.2 Water Withdrawal Legislation

Target: CWSs, NCWSs, and Other Interested Parties

The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, was amended in 2006 and again in 2008 in response to increased water use demands, pressure to divert water outside the Great Lakes Basin, and an increase in groundwater use conflicts. The legislative amendments were intended to enhance the state's ability to manage the water resources of Michigan.

Any proposed new or increased large quantity withdrawal, defined as a water withdrawal of 70 gallons per minute or more, requires an environmental assessment and approval prior to making use of the water resource. The new system capacity assessment checklist was amended to address large quantity water withdrawals and ensure authorization is obtained prior to DWEHD district staff issuing an Act 399 construction permit.

3.7.3 Surface Water Source Protection

Target: CWSs and NCWSs Using Surface Water

The SWIPP is the surface water counterpart to the WHPP. Under this program, water supplies develop partnerships with surrounding water supplies to identify and take action to protect the area around the intake. Fourteen water supplies have completed a

SWIPP, and represent a range of sizes, from small supplies, all the way up to the state's largest supplier of water. Blissfield, St. Clair, Adrian, and the Great Lakes Water Authority had SWIPPs approved in FY 2022. As with an approved WHPP, an approved SWIPP will result in additional priority points being awarded to DWRP applicants, encouraging more CWSs to develop a plan. A matching grant program, equivalent to that used in the WHPP, was incorporated into the administrative rules in 2009. SWIPP grant applications were available for the first time in May 2014. Approximately \$100,000 is made available to surface water systems annually, including in FY 2022.

Monitoring of surface water sources can alert utility personnel to changes in water quality in time to respond quickly and avoid public exposure to contamination. To achieve this quick response at CWSs in the connecting channels between Lakes Huron and Erie, beginning in 2008, the DWEHD worked with federal and local governmental agencies to install a continuous, real-time water quality monitoring network in the St. Clair River, Lake St. Clair, and the Detroit River. In FY 2018 the Real Time Monitoring Network was reestablished. The monitoring system includes data transmission, data visualization, automated notification/alarm service, data archiving, and a publicly accessible website for data retrieval. In addition, rapid toxicity test equipment is being used to monitor water distribution systems in southeast Michigan served by these surface water intakes. Nearly instantaneous communication is key to protecting surface water intakes in the Lake Huron to Lake Erie corridor because of the rapid rate of flow, periodic chemical spills, and corresponding changes in water quality.

In FY 2022, select cyanotoxin sampling was completed during the harmful algal bloom or HAB season. This sampling was consistent with that conducted during the previous two fiscal years and utilized a strategy similar to routine monitoring efforts in other USEPA Region 5 states. This approach provides consistent and meaningful occurrence data, and information regarding PWS susceptibilities to cyanotoxins over the course of the bloom season.

Raw and finished water was sampled weekly at PWSs with historical detections of cyanotoxins, with analysis for microcystins, nodularin, cylindrospermopsin, and anatoxin-a. Raw and finished water at all other supplies was sampled on a biweekly basis, with analysis for microcystins and nodularin only.

The paired raw/finished sampling approach protects public health through the ongoing assessment of potential cyanotoxin impact on public drinking water. The data collected may also lead to a refined and targeted monitoring approach in the future, allowing resources to be directed to surface water sources that are most susceptible to cyanotoxins.

In FY 2022, 16 supplies detected microcystins and a single supply detected nodularin in their source (raw) water. Additionally, three supplies detected microcystins in their

finished water. These finished water detections were significantly lower than the USEPA Health Advisory Level for total microcystins in each case. There were no supplies that detected cylindrospermopsin or anatoxin-a in any samples during 2022.

In another area of source water protection, a DWEHD staff person coordinates the notification to district staff about proposed aquatic nuisance permits to surface waters that may impact drinking water sources. Some permits have been streamlined by previous applications when it has been known to not impact a drinking water source. Other permit applications may present a concern and require further communication between district staff and a CWS to resolve the issue. A DWEHD staff person also began coordinating with EGLE's Water Resources Division to identify water bodies with cyanotoxin and perfluorinated compound (PFC) detections that may initiate additional monitoring where drinking water intakes may be impacted.

3.8 PFAS Sampling and Outreach

In FY 2020 greater public protection was achieved through testing and reducing exposure to PFAS. New PFAS drinking water rules took effect on August 3, 2020. These rules amended current drinking water rules for CWSs and NTNCWSs by establishing MCLs and sampling requirements for seven PFAS compounds. PFAS sample results are being reviewed by DWEHD Emerging Contaminants Unit staff and shared with MPART and its partner agencies.

In FY 2022, EGLE Statewide Municipal Sampling contract funds were utilized to monitor PWS surface water intakes for PFAS in raw water. Approximately 70 supplies participated in this voluntary sampling effort. These results were shared with designated operators, DWEHD staff, other EGLE divisions, and MPART, to assess PFAS contamination and guide decision-making related to PFAS in Michigan's surface water resources.

3.9 Security and Emergency Response

Target: CWSs

EGLE's Water Security and Emergency Management Program is responsive to the various federal programs and the needs of PWSs. Planning, training, and coordinating are all part of the effort to emphasize emergency management for all hazards, terrorism, and malevolent acts, as well as weather-related incidents and accidents.

Several DWEHD staff are involved in security and emergency management activities, including:

- USEPA, Region 5, AWIA training for utilities.
- Chlorination Emergency Preparedness sessions during DWEHD Rule School.

- Planning emergency training for all staff, particularly new staff.
- Participating in the EGLE Emergency Management Support Team.
- Participating in the ASDWA's Security and Resiliency Committee.
- MiWARN (Michigan Water/Wastewater Agency Response Network).
- HAZWOPER (Hazardous Waste Operations and Emergency Response).
- Involvement in PWS safety and security enhancements through the construction permit process and the operation of new supplies.
- Review of PWS emergency response plans during inspections.
- Circulation of USEPA Water Security Division notifications.
- Providing information as needed and keeping state website up to date on hauled water operators and sanitary operations for emergency situations.
- Providing assistance to the USEPA in following up with water supply completion of the Risk and Resiliency Assessment and Emergency Response Plan requirements.
- Worked with the USEPA in dissemination of training information on the AWIA's Risk and Resiliency Assessment Virtual Training for Water Supply owners and water operators.
- DWEHD staff participated in a United States Water and Wastewater Agency Response Network (USWARN) Region V Workshop on Emergency Drinking Water Supplies. DWEHD staff coordinated with several water supplies to attend.
- Participated in a department-wide Emergency Management Conference in June 2022

Field staff will continue to be involved in safety and security enhancements through the construction permit process and the operation of new supplies as well as during inspections.

3.10 Electronic Reporting and Data Management

Target: CWSs and NCWSs

The DWEHD is working to modernize IT systems, including electronic reporting capability to improve timeliness and accuracy of data reporting. Electronic reporting and data management improvements will help identify and analyze statewide compliance more efficiently.

3.10.1 Electronic Reporting

Target: CWSs and NCWSs

The DWEHD is continuing to pursue electronic reporting opportunities for PWSs as part of a division-wide information technology upgrade. These tools will provide for more timely and accurate collection of data and will allow the DWEHD to query additional parameters to assess capacity on a system-wide and statewide basis.

3.10.2 Tracking Compliance

Target: CWSs and NCWSs

The CWS Program uses the federally supported SDWIS/State database for tracking drinking water compliance activities, including monitoring schedules, sample results, sanitary surveys, violations, and other information.

A large percentage of the federal reporting data needed for the NCWS Program is being migrated to a SDWIS-Noncommunity database, allowing for more efficient quarterly federal reporting.

Beginning in FY 2018, the DWEHD was awarded funding from the State of Michigan and set-aside funds to update the division's IT systems. This includes building a new data system, MiEHDWIS, entering into a contract with GEC for management of SDWIS, and working toward adoption of the Compliance Monitoring Data Portal

Work continued on the development of MiEHDWIS through FY 2021, further enhancing document submission/management and permitting activities. These updates are expected to assist in data and record management, as well as allow for greater transparency for water supplies, LHDs, and EGLE staff. Work continued on all systems in FY 2022 and will continue in FY 2023.

3.10.3 WaterTrack

Target: NCWSs

LHD staff use the WaterTrack database to track NCWS inventories, certified operator information, sanitary survey reports, capacity development, construction permits, monitoring results, monitoring violations, MCL violations, and NCWS compliance reports. The information is monitored by EGLE staff that oversee the NCWS Program at the LHD. WaterTrack uses an outdated platform, is largely unsupported, and does not contain the capability to track all current rule requirements. Significant preparation, documentation and training occurred in FY 2022 and will continue to make the final transition from WaterTrack to SDWIS/State and other applications designed to interface

with SDWIS/State in FY 2023. The intention is to stop using WaterTrack and begin implementing SDWIS/State-based applications.

4. Identify Existing Supplies in Need

The strategy used to select and prioritize supplies for assistance is outlined in the *Capacity Development Strategy for Public Water Systems*, dated August 1, 2000, and remains unchanged. The DWEHD looks at the following criteria:

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

The sanitary surveys and surveillance visits are ongoing while identifying which supplies may need capacity assistance.

5. Identify Capacity Development Needs and Provide Assistance

EGLE continues to recognize and identify capacity development needs and provides assistance in these areas. The areas identified below continue to be a focus.

5.1 New Rules Implementation and Training

EGLE continues to provide LHD training. Typically, staff participate as speakers at regional MEHA seminars, locally sponsored environmental health meetings, and the MEHA Annual Educational Conference. Due to the success of webinar style trainings, EGLE continues to provide webinars as topics arise and has archived some trainings on a website for future viewing. This activity is in addition to the training mentioned in Section 3.5 of this report.

EGLE reviews operator training courses on an ongoing basis to update information and improve quality. OTCU staff reviews and updates certification examinations to ensure questions reflect new or changing regulations.

EGLE staff continued to offer training on recently promulgated rules, including the Michigan Revised LCR.

5.2.1 Implement New Federal Rules

While no new federal rule implementation occurred in FY 2022, the DWEHD program and field staff continued to host and participate in trainings on the more recent rule changes such as the RTCR, and we are keeping abreast of proposed federal rules changes, including federal LCR, PFAS, and CCR Revisions.

5.2.2 Capture Sanitary Survey Data

Sanitary survey data is captured in SDWIS/State and on survey questionnaires for every CWS. To enhance decision-making, the CWS Program is continuing to investigate options to capture data electronically in a format that can be more readily queried. Currently, CWS staff track basic survey data, specifically survey date; rating of the eight required elements; and deficiencies in SDWIS/State.

NCWS sanitary survey data is tracked in WaterTrack but will be tracked in SDWIS/State once WaterTrack is retired.

5.2.3 Implement Revised Nonfederal Provisions of the Administrative Rules

In FY 2018 Michigan promulgated revised lead and copper provisions of the Administrative Rules, adopting additional, more stringent requirements. These include, but are not limited to:

- Mandatory LSL replacement
- Enhanced sampling protocols and frequencies for lead, copper, and water quality parameters
- Mandatory submittal of updated DSMIs and sampling pools
- Reduction of the lead action level from 15 to 12 parts per billion in 2025
- Enhanced transparency

In FY 2020 Michigan promulgated new PFAS drinking water rules. The rules include, but are not limited to:

- Monitoring and reporting requirements
- MCLs for seven PFAS compounds
- MCL compliance determination
- Public notice requirements

5.2.4 Asset Management

As the infrastructure funding gap continues, field staff are stressing asset management concepts during interactions with CWSs and their local decision-makers. The DWEHD believes the asset management requirements, which went into effect January 1, 2018,

will foster better water system management. DWEHD staff are tracking the preparation of AMPs at water supplies and monitoring the success of these requirements. In addition, DWEHD staff have been encouraging asset management for supplies serving fewer than 1,000 people by meeting with water supply administrators and boards to educate them on the benefits of asset management.

EGLE staff also worked in partnership with TA providers to encourage asset management throughout the state. The DWEHD is also completing updates to the capacity development strategy, which includes work on asset management promotion for all water supplies. Including this in the strategy will highlight its importance and encourage additional work on ensuring water supplies have AMPs and adequate capacity.

5.3 Participation in National Workgroups

Program staff in the DWEHD are involved in national workgroups with other states, USEPA headquarters and regional offices, as well as the ASDWA and others to improve implementation or affect change to federal regulations and national policy.

The DWEHD engineering manager is participating in AWOP and has involved several other surface water engineers and analysts in AWOP training and implementation.

6. Review Existing Supplies Program Implementation and Address Findings

Sanitary surveys are a primary tool to evaluate capacity and identify needs for specific supplies. Administrative rules dictate sanitary survey frequencies for all types of CWSs and NCWSs. Follow up on deficiencies in any supply has been a long-standing practice and is required of the LHDs under contract with EGLE. The number of minor and significant deficiencies for CWSs and NTNCWSs in FY 2021 can be found in Table IV and Table III, respectively. The deficiencies are in varying states of resolution; many of them have already been resolved.

Between sanitary surveys, DWEHD field staff make routine on-site visits to review the technical, managerial, and, sometimes, financial aspects of a CWS and to establish channels of communication with the CWS. The knowledge and familiarity gained by both parties as a result of routine visits are keys to maintaining a cooperative relationship in achieving mutual goals.

The frequency of these visits is dictated in policy. Rather than attempt to increase the number of financial assessments, the DWEHD has continued to follow up with previously assessed water supplies informally during routine on-site visits by field staff.

7. Modify Existing Supplies Program Strategy

The strategy remained unchanged during the reporting period. EGLE is continuing to implement the original strategy of moving from capacity assessment through assistance to development. However, the DWEHD began the process of updating the strategy in FY 2020. The updated strategy will include the DWEHD's asset management activities in accordance with the requirements in the AWIA. Other proposed changes include combining the *New Community Water System Capacity Guideline Document* and the *Capacity Development Strategy for Existing Public Water Systems*, including plans for promoting technical capacity through workforce development, promotion of water supply partnerships, and implementing a periodic review of TMF capacity. The updated strategy was submitted to the Region 5 USEPA office in early FY 2023. Once approved, the updated strategy will be made available to all for reference.

8. Summary

Michigan is continuing to implement a program for new systems and a strategy for exiting systems as set forth in May and August 2000, respectively. The new systems' program retains the legal authority and the control points established in 2000. A list of new supplies in the last three years is included in Appendix A of this report.

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 primarily through the sanitary survey process, and that will now be supplemented by the information gained through AMPs. During the reporting period, needs were identified, and discussions were held to determine what areas could be enhanced. A review of implementation of various activities of the strategy occurred and changes were made. The strategy was not modified.

Appendix A: List of New Systems

New system compliance data is more meaningful when compared to all systems of the same classification, as summarized in the following table. No CWS system that became active during the last three fiscal years scored 11 or more on the ETT.

FY 2020 to FY 2022	CWS		NTNCWS	
	New	New and Existing	New	New and Existing
Number of supplies on ETT Report	9	1376	5	1261
Number of supplies with ETT score of 11 or more	0	11	0	39
Percent of supplies with ETT score of 11 or more	0%	0.8%	0%	3.1%

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PWS ID	PWS Name	PWS Type	First Reported to SDWIS
MI0062955	HEARTLAND HEALTH CARE CENTER	Community	9/23/2020
MI0005209	PAW PAW APTS - WEST MAPLE LAKE	Community	5/27/2021
MI0000215	ANDELINA FARMS	Community	9/1/2022
MI0064070	MAPLEVIEW NURSING HOME	Community	3/2/2022
MI0000503	BEACON HOME AT COLBY	Community	8/20/2019
MI0004920	OCEANA ACRES	Community	5/27/2021
MI0003215	HOLTON COTTAGES	Community	9/1/2021
MI0066700	THE PORCHES	Community	5/21/2020
MI0005566	PRAIRIE VILLAGE APARTMENTS	Community	8/20/2019
MI2053239	PURE COAST HOLDINGS, LLC.	Non-Transient Non-Community	3/1/2022
MI2041624	LITTLE TRAVERSE BAY HEAD START	Non-Transient Non-Community	3/1/2022
MI0070001	SPECTRUM HEALTH PENNOCK HOSPITAL	Non-Transient Non-Community	12/2/2021
MI0070005	ST. JOSEPH MERCY HEALTH SYSTEM	Non-Transient Non-Community	6/3/2020
MI0070006	MCLAREN FLINT HOSPITAL	Non-Transient Non-Community	6/3/2020
MI2053239	PURE COAST HOLDINGS, LLC.	Non-Transient Non-Community	3/1/2022
MI2041624	LITTLE TRAVERSE BAY HEAD START	Non-Transient Non-Community	3/1/2022
MI0070001	SPECTRUM HEALTH PENNOCK HOSPITAL	Non-Transient Non-Community	12/2/2021
MI0070005	ST. JOSEPH MERCY HEALTH SYSTEM	Non-Transient Non-Community	6/3/2020
MI0070006	MCLAREN FLINT HOSPITAL	Non-Transient Non-Community	6/3/2020

Notes:

The following supplies were listed as new in the ETT Scores Tracker. However, they are existing supplies as explained below and are, therefore, not new for the purpose of capacity development and not included in the above table.

MI00066695, THE PINES OF GOODRICH, is a supply that had been operating as a Type III water supply and was brought to the attention of EGLE staff by an LHD. The supply had an arsenic MCL violation. EGLE staff are working with them to install an arsenic treatment system. The system should be complete in 2023. The supply is currently providing bottled water.

MI0006101, SOUTH HAVEN AREA WATER AND SEWER AUTHORITY, is an authority formed out of existing water supplies for consolidation purposes. Because all the water supplies that formed the authority are existing water supplies, South Haven Area Water and Sewer Authority is not considered a new supply.