

## 1. Rules and Primacy

### FY2018 Michigan PWSS Rules and Primacy Work Plan Summary

October 1, 2017 to September 30, 2018

Federal funding used: PWSS grant, DWSRF set-aside funds for PWSS (supplemental), Small System Technical Assistance, Local Assistance for Capacity Development

Michigan contact: Amy Lachance, [lachancea1@michigan.gov](mailto:lachancea1@michigan.gov), 616-490-9590

Region 5 contact: **Jennifer Crooks**, [crooks.jennifer@epa.gov](mailto:crooks.jennifer@epa.gov), (312) 886-0244

RULE	LEGAL STATUS	TECHNICAL CONTACTS	EXPECTATIONS	EVALUATION
<b>SWTRs</b>	SWTR = Primacy FBRR = Primacy IESWTR= Primacy LT1 = Primacy LT2 = Primacy	<u><b>MDEQ</b></u> Amy Lachance <a href="mailto:lachancea1@michigan.gov">lachancea1@michigan.gov</a> 616-490-9590  <u><b>USEPA Region 5</b></u> Andrea Porter <a href="mailto:porter.andrea@epa.gov">porter.andrea@epa.gov</a> (312) 886-4427	<u>Federal Expectations</u> State has primacy for all 5 SWTRs.  <u>State Commitment</u> State commits to fully implement all required regulations, as stipulated in primacy agreement.  <u>Region 5 Assistance</u> Region 5 will evaluate the extent to which LT2 violations are reported to SDWIS-Fed.	<u>Discrepancies</u> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.  NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection byproducts, THMS, HAA5s, and bromate. WaterTrack cannot

				<p>report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations.</p> <p>The State's plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p> <p><u>Milestones</u> Michigan is reporting LT2 TT violations. As of April 2018, 33 TT violations and 2 M/R violations were reported to SDWIS/Fed.</p>
<b>RTCR</b>	Interim Primacy (final primacy package submitted)	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Andrea Porter <a href="mailto:porter.andrea@epa.gov">porter.andrea@epa.gov</a> (312) 886-4427</p> <p>Miguel Del Toral <a href="mailto:deltoral.miguel@epa.gov">deltoral.miguel@epa.gov</a> (312) 886-5253</p>	<p><b><u>Federal Expectations</u></b> State has interim primacy for RTCR. EPA reviewed draft rule/provided comments for public hearing in 2016. Promulgated in Oct 2016.</p> <p>EPA recommends that sample siting plans for RTCR are reviewed during sanitary surveys to ensure samples are</p>	<p><b><u>Discrepancies</u></b> NCWS program is unable to track all RTCR violation codes and report to SDWIS-Fed, although E.coli MCL and routine M/R violations (not additional routine M/R violations), and associated routine M/R violations continue to be tracked in WaterTrack and are reported to SDWIS quarterly. 44 LHDs are tracking remaining RTCR violations on Excel spreadsheets, and MDEQ hand-tabulates data quarterly.</p>

			<p>taken at representative sites and are taken during the appropriate time period. MDEQ stated that sample siting plans are also often reviewed following an MCL or total coliform positive event.</p> <p>In FY2016, CWS program requested updated sampling plans on revised forms from CWSs.</p> <p><u>State Commitment</u> State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>CWS program utilizes SDWIS/State for RTCR compliance (SDWIS 3.33), and is able to track and report all RTCR violations.</p> <p>Complete move of NCWS data from WaterTrack to SDWIS-</p>	<p>MDEQ received starter SDWIS/State database from SAIC in May 2017, and preliminary data mapping conducted in FY2017. Remaining data mapping and migration to SDWIS-State planned during FY 2018, and then report violations to SDWIS/state.</p> <p>The State's plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p> <p>Rate of NTNCWS and TNCWS RTCR/Nitrate M/R violations (Shared Goals 5 and 7, dated June 2018) continued to increase throughout 2017. Plan is to provide more State support for LHDs in FY 2018, such as the data entry pilot described below.</p> <p>MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A "late report" is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The</p>
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			<p>State, in order to report all RTCR violations.</p> <p>State is requesting updated sampling plans to ensure samples are taken in proper locations and during the proper time period.</p> <p>MDEQ NCWS program to continue to provide training to LHDs.</p> <p>LHDs are expected to contact NCWSs where repeat sampling is necessary within 24-hours of learning of a positive result.</p> <p>Under RTCR, failure to collect all repeat samples is an assessment trigger. MDEQ will issue violations for failure to conduct a triggered assessment and/or correct defects found during an assessment.</p> <p><u>Region 5 Assistance</u></p>	<p>State's plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p><u>Milestones</u>  MDEQ has reported 83 level 1 assessments (LV1A), 1 level 1 assessment/san surv (L2SS), and 38 level 2 assessments (LV2A).</p> <p>NCWS began piloting manual central office sample data entry of private lab results (to reduce LHD workload) at several LHDs.</p>
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			EPA will evaluate the extent to which RTCR violations are reported to SDWIS-Fed.	
<b>Ground Water Rule</b>	Primacy	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Andrea Porter <a href="mailto:porter.andrea@epa.gov">porter.andrea@epa.gov</a> (312) 886-4427</p> <p>Mostafa Noureldin <a href="mailto:noureldin.mostafa@epa.gov">noureldin.mostafa@epa.gov</a> (312) 353-4735</p>	<p><b><u>Federal Expectations:</u></b> CWS program is using SDWIS 3.33 and is able to report GWR violations. NCWS program (WaterTrack) tracks/reports some GWR violation types. Remaining violations will be reported once data is migrated to SDWIS/State. MDEQ is working with EPA-HQ/SAIC to deploy a NCWS version of SDWIS/State to facilitate reporting these violations, to be accomplished in FY 2018. MDEQ should ensure all LHDs instruct GW NCWSs to conduct source monitoring within 24 hrs of a TC positive.</p> <p>MDEQ should followup with all systems that fail to conduct GWR-triggered source water monitoring, and report</p>	<p><b><u>Discrepancies</u></b> NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection biproducts, TTHMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations. The State’s plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.  MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab</p>

			<p>all M/R violations to SDWIS-Fed.</p> <p><u>State Commitment</u>  State commits to fully implement all required regulations, as stipulated in primacy agreement. MDEQ directing resources to adoption of SDWIS Prime 1.0. State plans to begin submitting triggered source M/R violations to SDWIS-Fed via SDWIS/State in FY 2018. Goal is to adopt SDWIS Prime in FY 2019, which will fully automate compliance determination for GWR. Complete move of NCWS data from WaterTrack to SDWIS-State, in order to report all GWR violations.</p> <p><u>Region 5 Assistance</u>  EPA will evaluate the extent to which GWR violations are reported to SDWIS-Fed. According to SDWIS-Fed, <u>State reported for GWR in</u></p>	<p>results after the due date, which is a reporting violation). The State's plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p><u>Milestones</u>  As of April 2018, 20 TT violations (failure to address deficiency), 85 M/R (for source monitoring) violations, and 9 other (failure to respond/consult w/State) violations were reported to SDWIS/Fed.</p>
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			<p><u>2017:</u> 85 GWR M/R (source monitoring) violations, 20 GWR TT (failure to address deficiency) violations.</p>	
<p><b>Nitrites/Nitrates Rules (NO<sub>2</sub>/NO<sub>3</sub>)</b></p>	<p>Primacy</p>	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Janet Kuefler <a href="mailto:Kuefler.janet@epa.gov">Kuefler.janet@epa.gov</a> (312) 886-0123</p> <p>Miguel DelToral <a href="mailto:deltoral.miguel@epa.gov">deltoral.miguel@epa.gov</a> (312) 886-5253</p>	<p><u>Federal Expectations</u> As noted in regulation</p> <p><u>State Commitment</u> State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>Complete move of NCWS data from WaterTrack to SDWIS-State, in order to report all NCWS violations.</p> <p><u>Region 5 Assistance</u> As requested.</p>	<p><u>Discrepancies</u> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>An increased number of nitrate/nitrate and bacteriologic violations at NTCWS and TNCWS in FY 2017 is the result of increased demands on limited LHD resources, and sometimes occur when there has been staff turnover at LHDs. See (Shared Goals 5 and 7, dated June 2018) Plan is to provide more State support for LHDs in FY 2018.</p>

				<p><u>Milestones</u> NCWS began piloting manual central office sample data entry of private lab results (to reduce LHD workload).</p>
<b>Lead and Copper Rules (LCR)</b>	Primacy for LCR, LCRM, and LCRSTR	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Andrea Porter <a href="mailto:porter.andrea@epa.gov">porter.andrea@epa.gov</a> (312) 886-4427</p> <p>Miguel DelToral <a href="mailto:deltoral.miguel@epa.gov">deltoral.miguel@epa.gov</a> (312) 886-5253</p>	<p><u>Federal Expectations</u> As noted in regulation</p> <p><u>State Commitment</u> CWS: 90<sup>th</sup> percentile values/violations are tracked and reported as required. NCWS: 90<sup>th</sup> percentile exceedances data (in WaterTrack) are generated and submitted to SDWIS/ODS along with manually generated milestones for a couple of large NTNCWSs where non-exceeding 90<sup>th</sup> percentile records are required.</p> <p>State commits to fully implement all required regulations, as stipulated in primacy agreement.</p>	<p><u>Discrepancies</u> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached 2017 Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection byproducts, THMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC</p>



			<p>Complete move of NCWS data from WaterTrack to SDWIS-State, in order to report all NCWS violations, including Type 65 (PE) and 66 (LCN) violations for NTNCWSs.</p> <p>NCWS program will develop procedures to document why a previous sampling location was not used in the most recent round of monitoring.</p> <p>MDEQ proposed more stringent LCR revisions in 2018, which should be promulgated by early FY 2019. MDEQ will review policies and procedures to ensure all revisions have been incorporated.</p> <p>During sanitary surveys at NTNCWSs, LHDs will identify sample sites for all analytes, and sample siting plans will be entered into Water Track.</p>	<p>M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations.</p> <p>The State's plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p> <p>To lessen workload at LHDs, MDEQ central office distributed LCN materials and tracked compliance with signed certification statements at all NTNCWSs in FY 2017, but cannot report violations due to staffing and database limitations. When SDWIS/State is operating, these violations can be submitted. (Previous timeline provided in 2017 Implementation Plan; revised timeline to be provided in 2018 Implementation Plan, due 45 days after date of grant award.)</p> <p>NCWS program continues to commit to informing NTNCWSs to collect annual and triennial samples between June and September. However, NCWS program/ WaterTrack does not have the capability of tracking</p>
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			<p>The NCWS program will continue to emphasize the electronic capture of sample siting plans in WaterTrack, with particular emphasis on RTCR and LCR sampling locations.</p> <p>MDEQ will provide comments on EPA proposed LCR LTR.</p> <p>NCWS commits to implementation of LCN requirements, followup and enforcement.</p> <p>MDEQ commits to full implementation of submittal of lead and copper reporting form by CWSs and NTNCWSs.</p> <p>See documentation at the end of this document from the MDEQ FY 2017 self-assessment dated Dec 2017, for a list of LCR implementation activities, that are in addition to rule requirements.</p>	<p>compliance with June-September timeframe. MDEQ requests EPA/R5 assistance in identifying these violations and sending violation notices.</p> <p><u>Milestones</u> CWS program is reporting LCRSTR violations, Type 66. As of April 2018, 118 M/R violations were reported to SDWIS/Fed.</p> <p>Tremendous amount of additional work above and beyond LCR requirements has been accomplished during FY 2017. See the end of this document.</p> <p>R5 acknowledges MDEQ's significant activity in the last several years to improve LCR implementation in Michigan, as well as additional implementation activities planned and in progress.</p>
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			<p><u>Region 5 Assistance</u> The LCR LTR proposed rule date is TBD. R5 will provide training on the proposal.</p> <p>R5/MDEQ Worksharing during FY 2018 to conduct enforcement/ reporting violations to SDWIS-Fed, against NTNCWSs that sample for lead/copper outside June-Sept timeframe TBD.</p> <p>EPA will evaluate the extent to which LCRSTR violations (Type 66) are reported to SDWIS-Fed. <u>LCRSTR</u>: 118 consumer notification M/R violations reported in FY 2017, which is more than double than reported in FY 2015. MDEQ is not reporting Type 66 violations for NTNCWSs, for reasons stated previously. Tracking of Type 66 violations occurs outside</p>	
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			WaterTrack. (See Attachment D-Data Management Limitations for FY 2018.)	
<b>Disinfectants/Disinfection By-Products Rule (D/DBPR)</b>	Primacy for Stage 1 DBPR, and for Stage 2 DBPR	<p><b>MDEQ</b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b>USEPA Region 5</b> Mostafa Nouredin <a href="mailto:nouredin.mostafa@epa.gov">nouredin.mostafa@epa.gov</a> (312) 353-4735</p> <p>Miguel DelToral <a href="mailto:deltoral.miguel@epa.gov">deltoral.miguel@epa.gov</a> (312) 886-5253</p>	<p><b>Federal Expectations</b> As noted in regulation</p> <p><b>State Commitment</b> State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>CWS has moved chlorine residual tracking to SDWIS/State to consolidate and improve compliance tracking.</p> <p>MDEQ is working with EPA/SAIC to deploy a NCWS version of SDWIS/State in FY 2018. Complete move of NCWS data from WaterTrack to SDWIS-State, is expected in order to report all NCWS violations.</p> <p><b>Region 5 Assistance</b> R5 will continue to evaluate the extent to</p>	<p><b>Discrepancies</b> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection biproducts, TTHMS, HAA5s, and bromate. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations.</p>

			<p>which Stage 2 violations and 141.130(c) operator certification treatment technique violations are reported to SDWIS-Fed.</p>	<p>WaterTrack cannot track/report MRDLs. Required sampling is taking place. The State's plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p> <p><u>Milestones</u> Michigan is reporting Stage 2 violations. As of April 2018, the following violations were reported to SDWIS/Fed: 38 MCL and 399 M/R violations. 34 violations for failure to submit a monitoring plan, and 19 violations for failure to submit Stage 2 Report, were also reported to SDWIS-Fed. In addition, MDEQ has committed to report Type 12 violations when compliance assistance has failed; the most recent Type 12 violation was reported June 2017, for a total of 8 TT violations. (Stage 1 rule, when a system using disinfection is not operated by a state-approved qualified operator (141.130(c)).</p>
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<p><b>Inorganic Contaminants Rules (IOC—including Arsenic)</b></p>	<p>Primacy</p>	<p><b><u>MDEQ</u></b>  Amy Lachance  <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a>  616-490-9590</p> <p><b><u>USEPA Region 5</u></b>  Janet Kuefler  <a href="mailto:Kuefler.janet@epa.gov">Kuefler.janet@epa.gov</a>  (312) 886-0123</p>	<p><b><u>Federal Expectations</u></b>  As noted in regulations.</p> <p><b><u>State Commitment</u></b>  State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>MDEQ commits to continue its work to ensure NTNCWSs address arsenic noncompliance with a permanent form of treatment; and remove bottled water being used as a temporary fix to address noncompliance.</p> <p><b><u>Region 5 Assistance</u></b>  R5 will continue to evaluate arsenic MCL noncompliance as reported to SDWIS-Fed. According to data reported to SDWIS-Fed: As of January 2018, data indicates 99.78% CWSs were in compliance where 3 CWSs with 9 health-based violations (total pop 376) had</p>	<p><b><u>Discrepancies</u></b>  MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection biproducts, TTHMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations. The State’s plan and phased schedule for full implementation of a NCWS data management</p>
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			<p>arsenic MCLs that were not RTC'd. 99.15% NTNCWSs were in compliance where 8 NTNCWSs with 11 health-based violations (total pop 734) had arsenic MCLs that were not RTC'd.</p> <p>EPA will continue to request updates on NTNCWSs under BW agreements as part of quarterly ERP letters.</p>	<p>system is provided in the attached Implementation Plan.</p> <p><u>Milestones</u> January 2018, 11 systems (out of 2,694) had arsenic MCLs that were not RTC'd, including 3 CWSS (out of 1,385) and 8 NTNCWSs (out of 1,309).</p> <p>As of March 2018, there were 6 were 6 NTNCWSs remaining on bottled water to meet the arsenic rule.</p>
<b>Radionuclides Rule</b>	Primacy	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Val Bosscher bosscher.valerie@epa.gov (312) 886-6731</p>	<p><u>Federal Expectations</u> As noted in regulations.</p> <p>MDEQ should ensure that PWSs monitor all entry points under the new Radionuclides Rule.</p> <p><u>State Commitment</u> State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p><u>Region 5 Assistance</u> As requested.</p>	<p><u>Discrepancies</u> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A "late report" is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State's plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p>
<b>Synthetic Organic Contaminants Rule (SOC)</b>	Primacy	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a></p>	<p><u>Federal Expectations</u> As noted in regulations.</p>	<p><u>Discrepancies</u> MDEQ is working to fully implement the tracking and</p>

		<p>616-490-9590</p> <p><b>USEPA Region 5</b>  Janet Kuefler  <a href="mailto:Kuefler.janet@epa.gov">Kuefler.janet@epa.gov</a>  (312) 886-0123</p>	<p>Any changes to the originally approved waiver program must be submitted to R5 for approval.</p> <p><u>State Commitment</u>  State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>There were no changes to the MDEQ waiver program during FY 2017.</p> <p><u>Region 5 Assistance</u>  As requested.</p>	<p>reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection biproducts, TTHMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations.</p> <p>The State’s plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p>
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<p><b>Volatile Organic Contaminants Rule (VOC)</b></p>	<p>Primacy</p>	<p><b><u>MDEQ</u></b>  Amy Lachance  <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a>  616-490-9590</p> <p><b><u>USEPA Region 5</u></b>  Janet Kuefler  <a href="mailto:Kuefler.janet@epa.gov">Kuefler.janet@epa.gov</a>  (312) 886-0123</p>	<p><b><u>Federal Expectations</u></b>  As noted in regulations.</p> <p><b><u>State Commitment</u></b>  State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p><b><u>Region 5 Assistance</u></b>  As requested.</p>	<p><b><u>Discrepancies</u></b>  MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection byproducts, THMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source water and lead consumer notice M/R violations. The State’s plan and phased schedule for full implementation of a NCWS data management</p>
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				system is provided in the attached Implementation Plan.
<b>Public Notification Rule (PN)</b>	Primacy	<p><b><u>MDEQ</u></b> Amy Lachance <a href="mailto:Lachancea1@michigan.gov">Lachancea1@michigan.gov</a> 616-490-9590</p> <p><b><u>USEPA Region 5</u></b> Kristina Bell bell.kristina@epa.gov (312) 886-7489</p>	<p><b><u>Federal Expectations</u></b> As noted in regulations.</p> <p><b><u>State Commitment</u></b> State commits to fully implement all required regulations, as stipulated in primacy agreement.</p> <p>MDEQ will continue to enforce Tier 1/Tier 2 PN. Once additional IT solutions are available, including electronic submission and automated notices, MDEQ will expand Tier 3 enforcement to achieve full implementation. In the short-term, beginning July 1, 2018, and until full enforcement capability can be achieved, MDEQ will make available on its website, by July 1 each year, as list of water supply violations with Tier 3 PN requirements. This will provide a more</p>	<p><b><u>Discrepancies</u></b> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p> <p>NCWS program, via WaterTrack, can generate and report any MCL violation that would apply to a noncommunity system, including disinfection biproducts, TTHMS, HAA5s, and bromate. WaterTrack cannot report MRDL violations. WaterTrack can also generate and report any M/R violation, including IOC/VOC/SOC M/R violations, except GWR triggered source M/R, LCR source</p>

			<p>user friendly, quick-reference for the public. See attached Implementation Plan.</p> <p><u>Region 5 Assistance</u> As requested.</p>	<p>water and lead consumer notice M/R violations. The State’s plan and phased schedule for full implementation of a NCWS data management system is provided in the attached Implementation Plan.</p> <p><u>Milestones</u> To address the inability of the State to track Tier 3 PN, MDEQ outlined in its 2017 Improvement Plan (Oct 4, 2017), that it would issue Tier 3 PN violations for all water systems with Tier 3 PN violations on the MDEQ website on July 1, 2018.</p>
<p><b>Consumer Confidence Report Rule (CCR)</b></p>	<p>Primacy</p>	<p><b>MDEQ</b> Krista Robinson <a href="mailto:Robinsonk24@michigan.gov">Robinsonk24@michigan.gov</a> 517-599-8655 <b>USEPA Region 5</b> Janet Kuefler <a href="mailto:kuefler.janet@epa.gov">kuefler.janet@epa.gov</a> (312) 886-0123</p>	<p><u>Federal Expectations</u> As noted in regulations. A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs.</p> <p><u>State Commitment</u> State commits to fully implement all required regulations, as stipulated in primacy agreement, that includes issuing violations to CWSs that did not issue a CCR.</p>	<p><u>Discrepancies</u> MDEQ is working to fully implement the tracking and reporting Tier 3 PN violations, and the late reporting component of their program (A “late report” is when a system samples during the proper timeframe but submits the lab results after the due date, which is a reporting violation). The State’s plan and phased schedule for full implementation is provided in the attached Implementation Plan.</p>

			<p>During FY 2017 conducted targeted CCR content review, with attention paid to LCR 90<sup>th</sup> percentile reporting, inclusion of lead language, and compliance with MCL and TT violation information. MDEQ will work towards full content review in FY 2018, and will continue activities described above in FY 2018.</p>	
<p><b><u>Additional LCR implementation activity above and beyond rule requirements.</u></b></p>				
<p><u>Regulations:</u> MDEQ has proposed more stringent LCR rules and held stakeholder meetings during FY17 to evaluate the proposals. The process continues in FY18.</p> <p><u>Education:</u> MDEQ notified all CWSs of their lead/copper sampling obligations through the annual monitoring content review in FY 2017. Information on lead/copper was provided at the MiAWWA regional meetings and annual conference. Training was also provided to small private supplies at the annual examinations are reviewed prior to each exam cycle for accuracy and completeness. Staff discussed the LCR with CWSs during visits. More information on lead-copper monitoring was put on the web site. The operator NCWS: Through the lead consumer notice mailings, MDEQ recommended removal or replacement of taps testing between 5 and 15 ppb at NCWSs.</p> <p><u>Implementation Tools:</u> CWSs were given information on how to find instructions and guidance materials for proper lead/copper detection and sampling with their annual schedules. Brochures were made available, and CWSs were encouraged to utilize them, especially when conducting any construction that may impact water quality.</p> <p><u>Staff Education:</u> MDEQ implemented a Rule School program for all community and non-community staff, and held 6 sessions in FY17. Each session has focused on different rules or program implementation issues. Training for new CWS staff, particularly the analysts has become more standardized, and they have all received a 6-session course on implementing all the rules, including LCR. At the annual 2-day training for LHDs, MDEQ provided further training on the LCR and on calculation of 90<sup>th</sup> percentiles.</p> <p><u>Program Activities:</u> A peer review team was implemented, and continues to be utilized for plan review and complex decision making. The programmatic focus has been on rule revisions; therefore, the policy has not been updated, but will be addressed in FY18. Centralizing LCR CWS staff has improved consistency in rule implementation. CWS sample invalidation now requires a completed form with explanation, and signature of the LCR specialist and two supervisors. Enhanced technical assistance was provided to CWSs exceeding the AL for either contaminant. Staff have held teleconferences and on-site meetings with systems to assist with proper implementation of follow-up actions and PN requirements. All sample results over the action levels for lead and copper are sent to MDHHS for follow up.</p> <p><u>Staffing:</u> CWS currently has a LCR specialist, a LCR analyst, a corrosion control engineer, a distribution specialist, and a schools and outreach specialist. Requests for additional staff have thus far been denied.</p> <p><u>School Sampling:</u></p>	<p>lead/copper sampling obligations through the annual monitoring content review in FY 2017. Information on lead/copper was provided at the MiAWWA regional meetings and annual conference. Training was also provided to small private supplies at the annual examinations are reviewed prior to each exam cycle for accuracy and completeness. Staff discussed the LCR with CWSs during visits. More information on lead-copper monitoring was put on the web site. 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The Department of Education is administering a grant program to reimburse schools for lead testing and abatement activities. Notices were sent to all superintendents of Michigan schools. 167 schools applied for grant funds. MDEQ reviewed the applications to ensure they met grant criteria. All but 8 received grant funding, and most used the funds to replace drinking fountains. MDEQ has also been following up with schools with sample results greater than 5 ppb.

DWRF:

Guidance was developed and funds provided to one supply in FY17.

Data and Record Management:

Electronic data management is still being planned for use in all the MDEQ programs. LCR processing has been centralized, and records are being maintained electronically.

MDEQ conducted a Lean Processing Improvement (LPI) project on monitoring and compliance procedures, which clarified documentation and data needs. Following this process, MDEQ applied for a data management grant from the State to help develop and launch software that will not be adequately addressed by SDWIS Prime.

Additionally, a BPA is under development to obtain vendor help with SDWIS Prime and CMDP adoption.