







<b>FY2018 Michigan PWSS Program Sanitary Survey Work Plan Summary</b> October 1, 2017 to September 30, 2018 Federal funding used: PWSS grant, DWSRF set-aside funds	
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<b>Expectations</b>	<p>Michigan will maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys.</p> <p>Michigan will ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Michigan will ensure that sanitary surveys include an evaluation of the: (1) source; (2) treatment; (3) distribution system; (4) finished water storage; (5) pumps, pump facilities, and controls; (6) monitoring, reporting, and data verification; (7) system management and operation; and (8) operator compliance with state requirements.</p> <p>During sanitary surveys at noncommunity water systems, Local Health Departments (LHD) will identify sample sites/develop sample siting plans for all analytes, especially prioritizing completion of LCR sample siting plans for school/daycare facilities.</p> <p>Region 5 recommends that MDEQ consider using sanitary surveys to evaluate and document status and progress of source water protection (SWP) and sustainable water infrastructure (SWI) activities.</p> <p>EPA recommends that sample siting plans for RTCR and LCR are reviewed during sanitary surveys to ensure samples are taken at representative sites and are taken during the designated time period.</p>
<b>Region 5 Assistance</b>	<p>R5 will measure completeness of surface water and ground water sanitary surveys within the evaluation time period (3-5 years). This national measure will be measured again in July 2018 for the period of 2015-2017 and in July 2019 for the period of 2016-2018. (Track state commitments under measure SDWA-01a and update Michigan quarterly, engaging in discussion with states on progress as needed.)</p> <p>R5 is available to facilitate sanitary survey training for states, as requested.</p>

	<p>EPA encourages state surveyors and inspectors to recommend the following activities to PWS managers during sanitary surveys, because these activities can help in building the capacity and long-term independence of PWSs:</p> <ul style="list-style-type: none"> <li>▪ Asset management programs;</li> <li>▪ Energy efficiency programs;</li> <li>▪ Water loss monitoring/mitigation programs;</li> <li>▪ Source water protection and climate change adaptations; and</li> <li>▪ Other involvement or roles in the local community.</li> </ul> <p>As requested, EPA can help promote training about these topics and provide outreach information, as well as updates and guidance materials, about these types of activities.</p>
<p><b>Discrepancies/ Observations</b></p>	<p>Please note that it is understood that Surface Water system sanitary surveys take quite a bit of time compared to a Ground Water system sanitary survey. It appears from the numbers reported below, that the number of sanitary surveys for surface water systems at CWSs, has been decreasing slowly over the past several years.</p>
<p><b>Milestones</b></p>	<p>As outlined below, MDEQ has met its commitments regarding conducting sanitary surveys.</p>
<p><b>Self-Assessment and Evaluation</b></p>	<p><b>CWS program does use the sanitary survey process to encourage and evaluate activities related to source water protection and sustainable water infrastructure, as stated above (asset management programs, energy efficiency programs, water loss monitoring/mitigation programs, etc.)</b></p> <p><b>CWS/NCWS programs evaluate all 8 components during sanitary surveys and tracks the data in SDWIS. MDEQ has worked on reducing SDWIS errors for incomplete 8-element data. CWS incurred 59 errors of this type on the 12/2016 ODS Error Report, but only 29 such errors on the August 2017 ODS Error Report.</b></p> <p><b>National water program measure SDW-01a:</b>  <b>SURFACE AND GROUND WATER SYSTEMS:</b> As of April 2018, 91.4 percent (1249 out of 1366) of the sanitary surveys at CWSs were completed between CY 2015 and CY 2017. States had until March 2018 to report CY 2015 – CY 2017 sanitary survey data for this national measure.</p> <p><b>Sanitary survey completeness high priority query:</b>  <b>SURFACE WATER SYSTEMS:</b> As of April 2018, 87 percent (261 out of 300) of the surface water CWSs completed sanitary surveys between CY 2015 and CY 2017. In addition, and 100% (10 out of 10) of the transient, non-community water systems (TNCWSs) have completed sanitary surveys between CY 2013 and CY 2017.</p>

	<p><b>GROUND WATER SYSTEMS:</b> As of April 2018, 92.7percent, (988 out of 1066) of the ground water CWSs completed sanitary surveys between CY 2015 and CY 2017. In addition, 99.2 percent (1224 out of 1234) of the ground water NTNCWSs and 98.8 percent (7436 out of 7525) of the ground water TNCWSs have completed sanitary surveys between CY 2013 and CY 2017.</p> <p>See excerpt below from EPA’s FY 2015/FY 2016 End-of-Year Evaluation Report, dated Dec 18, 2017, regarding Michigan’s sanitary survey program.</p>		
<p><b>Relevant Attachments/References</b></p>	<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>MDEQ self-assessment, Dec 2017</p>  <p>_MDEQ FY2017 ARDP - EOY - FINAL.1</p> </td> <td style="width: 50%; vertical-align: top;"> <p>FY 2015/FY 2016 EOY Evaluation, Dec 2017</p>  <p>Michigan 15 16 EOY 12 18 17 (003).pdf</p> </td> </tr> </table> <p>Fact sheet on sanitary surveys at noncommunity water supplies:  <a href="https://www.michigan.gov/documents/deq/deq-odwma-ehs-ncws-sansurveybrochure_402744_7.pdf">https://www.michigan.gov/documents/deq/deq-odwma-ehs-ncws-sansurveybrochure_402744_7.pdf</a></p> <p><i>Optional:</i> State web pages, policies, etc. are generally optional to include as relevant attachments/references. Examples include:</p> <ul style="list-style-type: none"> <li>▪ State sanitary survey example form</li> <li>▪ State sanitary survey policy/guidance/manual</li> <li>▪ State sanitary survey web page</li> </ul>	<p>MDEQ self-assessment, Dec 2017</p>  <p>_MDEQ FY2017 ARDP - EOY - FINAL.1</p>	<p>FY 2015/FY 2016 EOY Evaluation, Dec 2017</p>  <p>Michigan 15 16 EOY 12 18 17 (003).pdf</p>
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Excerpt from EPA’s FY 2015/FY 2016 End-of-Year Evaluation Report, dated Dec 18, 2017, regarding Michigan’s sanitary survey program

**Sanitary Surveys:** MDEQ ensures that sanitary surveys are conducted on a frequency consistent with requirements specified by rule (every 3 years for CWSs and every 5 years for NCWSs). The LHDs are under contract by the State to perform sanitary surveys at all NCWSs. Each LHD’s sanitary survey efforts are reviewed by the State periodically, but not less than annually. EPA Region 5 tracks State commitments to conduct sanitary surveys within the federally required intervals.

MDEQ accomplished the following (as reported by SDWIS-Fed):

- Michigan completed 93.3% of ground water and surface water sanitary surveys at CWSs completed between CY 2013 and CY 2015, which exceeds the National Program Measure, SDW-01a, of 79%.
- Michigan completed 91.4% of ground water and surface water sanitary surveys at CWSs completed between CY 2014 and CY 2016, which exceeds the National Program Measure, SDW-01a, of 79%.

Specifically,

- Surface Water (SW) systems:
  - For the time period CY 2013 – CY 2015, 92.9% (276 out of 297) of CWS surface water sanitary surveys were completed; and 100% (11/11) of TNCWS sanitary surveys were completed for the time period CY 2011 – CY 2015.
  - For the time period CY 2014 – CY 2016, 89% (267 out of 300) of CWS surface water sanitary surveys were completed; and 100% (11/11) of TNCWS sanitary surveys were completed for the time period CY 2012 – CY 2016.
- Ground Water (GW) systems:
  - For the time period CY 2013 - CY 2015, 93.4% (999/1,070) of CWS ground water sanitary surveys were completed; for the time period CY 2011 - CY 2015, 98.1% (1,206/1,229) of NTNCWS ground water sanitary surveys were completed; and, for the time period CY 2011 – CY 2015, 98.3% (7,531/7,661) of TNCWS sanitary surveys were completed.
  - For the time period CY 2014 - CY 2016, 92.1% (982/1,066) of CWS ground water sanitary surveys were completed; for the time period CY 2012 - CY 2016, 98.8% (1,212/1,227) of NTNCWS ground water sanitary surveys were completed; and, for the time period CY 2012 – CY 2016, 98.6% (7,477/7,587) of TNCWS sanitary surveys were completed.