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Representing Local Environmental Public Health Departments in Michigan

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Michigan Dept of Environment, Great Lakes, and Energy (EGLE)

Constitution Hall

525 West Allegan St.

P.O. Box 30817

Lansing, MI 48909-8311

January 25, 2022

RE: Non-Community Water Supplies – Request for additional assistance and funding

Dear Ms. DeBruyn:

The Non-Community Water Supply program is one of the most complex and impactful public health programs that Local Health Departments/Districts (LHDs) implement. Since 1993, LHDs have administered the Non-Community Water Supply Program (Type II) for the State of Michigan through a “Grant Agreement” (Agreement) made between the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and LHDs. Throughout the many years of the Type II program, LHD non-community water supply coordinators and other LHD staff have dedicated themselves to administering the program, under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, and the Administrative Rules (Act 399) and Michigan’s Water Well Construction and Pump Installation Code, Part 127 of Act 368 PA 1978, as amended (Part 127) with insufficient state funding to support it.

When the Revised Total Coliform Rule (RTCR) was rolled out, there was expressed concern by LHD coordinators and administrators about the significant workload it added to LHDs. An increased workload by RTCR ensued while funding levels remained the same. Then there were changes to the Lead and Copper Rule, the addition of PFAS monitoring and responses required for exceedances in both areas. These additions further exacerbated the existing burdensome workload from RTCR of data entry, reminder due notices, phone calls, multiple spreadsheets for monitoring and insufficient software support by adding another layer.

The success of the program is driven by the passion and commitment of the staff and coordinators that manage it. The continued inadequate funding of LHDs to manage this program stresses and stretches the existing program staff beyond their capacity as they try to keep up. It is no longer sustainable at the local health department level to maintain due to the lack of staffing capacity and funding constraints without having to reallocate resources.

However, there is an opportunity with the Governor’s Executive Directive to assist and improve LHD funding. As we begin to discuss ways to achieve the goals of the Governor’s Directive Order, here are some options for EGLE to consider as a starting point:

1. Increased program funding to support the actual cost to administer the program including the additional activities for seasonal water supplies.



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2. Convene a Non-Community Stakeholder Group with representation from Non-Community Coordinators, MALEHA, MALPH and EGLE.
3. Since Non-Transient Noncommunity (NTNC) water supplies typically have complex water systems and have expanded parameter monitoring requirements vs Transient Noncommunity (TNC) water supplies, EGLE-NCWSU staff administer the Type II program for each LHD that chooses to opt out of administering that portion of the program.
4. EGLE-NCWSU staff administer the Type II program requirements for the Lead/Copper Rule and PFAS (and possibly Arsenic) for all NC water supplies required to monitor for those parameters.
5. EGLE-NCWSU staff administer the Type II program requirements for any NC water supply that exceeds an Action Level of the Lead/Copper Rule or the Maximum Contaminant Level (MCL) for the PFAS, Arsenic, Cyanide, Complete Metals, Volatile Organic Contaminants (VOC), and Synthetic Organic Contaminants (SOC) until the facility until the MCL is addressed and resumes routine monitoring of their water supply for the parameter(s) in question.
6. Require all EGLE Certified Drinking Water Labs to report sample results in a centralized system that communicates results to the Type II program.
7. Establish a standardized training program to support the Non-Community Program for new and existing coordinators.

This is a very important program that we administer and want to continue administering locally but need help doing so. With the measures above and future measures determined after in-depth dialogue, I am sure that we can arrive at a place that equally supports this program and local public health.

Sincerely,

A handwritten signature in black ink that reads "Sara Simmonds".

Sara Simmonds – MPA, REHS
MALEHA President
Kent County Environmental Health Director
sara.simmonds@kentcountymi.gov

cc: Mr. Connor Wickham, EGLE Type II Noncommunity Drinking Water Program – Acting Supervisor