

State of Michigan

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Department of Environment, Great Lakes, and Energy



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INTERNET: <http://www.michigan.gov/drinkingwaterrevolvingfund>

Drinking Water State Revolving Fund Intended Use Plan Fiscal Year 2020

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DWSRF Draft Project Priority List (PPL) for Fiscal Year (FY) 2020
DWSRF Draft PPL Scoring for FY 2020
Estimated Category Costs for FY 2020 Draft PPL
Draft Project Re-evaluation Request

I. INTRODUCTION

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) through the Finance Division administers the Drinking Water State Revolving Fund (DWSRF). The DWSRF program details are set forth in Part 54, Safe Drinking Water Assistance, MCL 324.5401-324.5421, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). In addition, the Michigan Finance Authority (Authority) is charged with administering DWSRF funds through the Shared Credit Rating Act, 1985 PA 227, as amended (Act 227).

The DWSRF provides reduced interest rate loan financing to qualified water suppliers to finance construction of public water systems. Projects may include new wells, new water treatment plants, storage facilities, upgrades or expansions to existing facilities, transmission lines, pumping facilities, and other related waterworks system improvements. Suppliers must meet federal and state program requirements, as well as demonstrate their ability to publicly finance their project and retire project debt. In addition to the loan provided by EGLE, suppliers also have the option to pay for part of their project with cash and other resources. Since 1998, Michigan has awarded over \$1 billion in financial assistance to over 295 borrowers. In fiscal year (FY) 2020, the DWSRF Project Priority List (PPL) contains \$258 million worth of projects.

This Intended Use Plan (IUP) describes how EGLE and the Authority will jointly administer all available DWSRF funds during FY 2020. An IUP is a required part of the process to request the federal 2019 capitalization grant, which will be matched with 20 percent in state match funds. The 2019 capitalization grant allotment for Michigan is \$27,011,000. The Water Infrastructure Financing Section (WIFS) of the Finance Division is charged with carrying out the program administration responsibilities. The Community Water Supply Section (CWSS) of the Drinking Water and Environmental Health Division (DWEHD) will assess project priority, issue the necessary construction permits, and offer technical review and assistance throughout project planning, design, and construction. Financial administration of the program will be handled by the staff of the Authority.

The U.S. Environmental Protection Agency (EPA) Region 5 staff will offer guidance and conduct annual program oversight reviews of the DWSRF. The EPA serves as a helpful partner in creating and maintaining this program.

The relationship between EGLE, the Authority, and the EPA is established in an Operating Agreement signed by authorized signatories from each agency. The Operating Agreement is incorporated into this IUP by reference and is available from EGLE upon request.

The IUP includes details on specific project funding and identifies amounts to be set aside from federal capitalization grants for other uses authorized under the federal Safe Drinking Water Act (SDWA) and Part 54 of Act 451. A public hearing was held on August 21, 2019, at Constitution Hall, located at 525 West Allegan Street, Lansing, Michigan.

EGLE certifies that it is recognized by the EPA as the primary agency for management of the drinking water program. The priority system was developed by EGLE and will be used each fiscal year to determine which projects will have access to DWSRF assistance. The priority system is designed to provide low-interest financing to those projects that will have the greatest impact in facilitating safe drinking water supplies.

FY 2020 Project Funding

The 2019 federal capitalization grant allotment for Michigan is \$27,011,000. Congress mandated that 20 percent of this amount be provided as additional subsidy to borrowers. EGLE plans to provide this 20 percent as principal forgiveness. An additional six percent to 35 percent must be provided to disadvantaged communities as principal forgiveness. All DWSRF projects funded in FY

2020 must pay their workers the federal Davis-Bacon wage rates for their job classification and comply with American Iron and Steel requirements.

II. STRUCTURE OF THE DWSRF

Due to a large increase in demand in FY 2020, EGLE will operate the DWSRF as a leveraged program, similar to the Clean Water State Revolving Fund (CWSRF). The state will sell State Revolving Fund revenue bonds that are secured by federal and state assets (i.e., federal capitalization grant, required state match, loan repayments, and interest earnings). State funds can include general fund or state revenue bonds. Bond issuance costs are covered by the bonds sold and, thus, are not identified as direct administrative expenses of the DWSRF. Historically, bond issuance costs are appropriately one percent of the total bond issue. Project costs of the local units of government are reimbursed from the bond issues.

For borrowers who are non-municipal entities, limitations on private activity from tax-exempt issues would require EGLE and the Authority to fund private water suppliers from funds other than tax-exempt revenue bonds. These loans would be made as direct loans with a letter of credit supplied by the private borrower or through a partnership with a private lending institution with the state providing an insurance annuity. There are no private, non-municipal water suppliers on the FY 2020 PPL.

There is a provision for subordinate investment of funds between the DWSRF and the CWSRF. This concept permits the administrators of the two funds to make temporary investments from one fund or the other in the event that monies are needed to service debt on the state's tax-exempt bond issues, cover deficiencies in a fund's reserve accounts, or satisfy other reserve account requirements. Only those funds periodically released from debt service reserve accounts, supplemental reserve accounts, revenue accounts, or any other account of the fund, wherein released monies may be generated, may be used for the purposes of subordinate investment.

At each point that monies are released, EGLE and the Authority will undertake a "snapshot" look at both the SRF and the DWSRF. For each fund, we will first examine whether we need to service debt or satisfy reserve account requirements within the fund from which the released monies originated. Next, we will examine the other fund for the same conditions. Then, if sufficient monies are available to satisfy requirements for each fund, the released money will pass completely through and become available for future commitments to new projects consistent with its source. This provision will not be exercised in FY 2020.

Set-asides in the DWSRF are derived from the capitalization grant awarded to the state by the EPA. Set-asides are designated for specified uses within the DWSRF to address areas of concern included in the reauthorization of the SDWA. Legal provisions included in Act 227 permit the Authority and EGLE to establish accounts and sub-accounts to track revenues and expenditures for the set-asides. The set-asides for program and other activities will be directly administered by the Environmental Health Section (EHS) of the DWEHD, with support from the CWSS. EHS and CWSS staff will also be responsible for the technical assistance activities, except for those funds made available to subsidize loans to disadvantaged communities. The disadvantaged community loans will be managed by WIFS.

The following is a list of potential set-asides identified in Section 1452 of the federal SDWA. The percentages noted affect the federal capitalization grant amount available to fund projects.

DWSRF Administration - 4 percent

Technical Assistance - 2 percent

Program Set-asides - 10 percent

- Public Water System Supervision

Other Activities - 15 percent, not to exceed 10 percent for any one activity

- Local Assistance for Capacity Development
- Wellhead Protection

III. ADVANTAGES OF THE DWSRF

The primary advantage for Michigan water suppliers is their ability to borrow funds at interest rates below market. The DWSRF interest rate is established prior to each new fiscal year. As identified in Part 54 of Act 451, determination of the interest rates is based on loan demand, market conditions, program costs, and future needs.

In setting the interest rates for FY 2020, EGLE examines a widely used market index for general obligation municipal bonds to identify current market conditions existing at the time the draft IUP is prepared. Then, to establish a rate of interest for municipal borrowers, EGLE considers present and future demand for DWSRF assistance and the costs to comply with program requirements.

Once the interest rate is determined for municipal borrowers, the resulting interest subsidy to municipalities will be used for private borrowers. If a private borrower chose to obtain a letter of credit and receives a direct DWSRF loan from the Authority, the interest rate would be determined by using the U.S. T-bill rate as the base and applying an identical percentage reduction of interest as municipalities receive. For those private borrowers who chose to obtain financing through a financial institution, the interest rate would be the lending institution's rate, reduced by an identical percentage as a municipality would receive.

The interest rate for municipal borrowers in FY 2020 is 2.0 percent for both 20-year and 30-year loans.

Apart from the low-interest rate, suppliers also benefit from the DWSRF in that they can finance all eligible waterworks system costs. The major benefit results from the fact that water supply financing in the past has always been left to the local units of government or private entities. Historically, there has been no significant state financial assistance available to local officials in meeting water supply needs. Recently, EGLE provided \$9.5 million to 18 communities for the Pilot Drinking Water Community Water Supply Grant program. The grant program is funded by a state appropriation. The pilot will provide lessons learned for full lead service line replacement and asset management.

IV. GOALS

Michigan's DWSRF establishes a funding source designed to protect and preserve public health within the state's boundaries. Michigan's geographical identity as a "Great Lakes" state affords its residents with an abundant and high-quality water resource from which to draw its drinking water. Unlike many states, Michigan has plentiful supplies of fresh water with few periods of restricted use. The great challenge for water suppliers lies in protecting the high quality of the resource, as well as ensuring that adequate volume and pressure exist to deliver potable water to the customer.

To this end, Michigan's DWSRF has the following long-term goals:

Goal: *Provide low-cost financing for waterworks system improvements or upgrades while maintaining the perpetuity of the DWSRF.*

The Authority uses a financial advisor to guide decisions on funding levels, interest rates, and other financing terms. Michigan looks to balance the goals of meeting the capitalization grant requirements (i.e., additional subsidies, Davis-Bacon, signage, American Iron and Steel) while maintaining the DWSRF in perpetuity.

Goal: *Continue effective partnerships with other federal and state financing sources to promote efficiency in environmental review procedures and coordination of funding.*

Given the limitations on pooled capital, EGLE continues to work together with various federal and state agencies, such as the U.S. Department of Agriculture - Rural Development, Rural Community Assistance Program, the Michigan Department of Health and Human Services, Michigan Economic Development Corporation and the Michigan Department of Transportation, so that we may collectively fund qualifying projects and maximize use of our capital pool to achieve stated goals. Such partnerships ultimately benefit everyone. Industry, tourism, and day-to-day quality of life are strengthened when our most valuable natural asset is preserved and made available for use and enjoyment.

Goal: *Maintain statewide compliance with all applicable state and federal drinking water laws, rules, and standards while protecting the public health and environmental quality of our state.*

EGLE will use DWSRF set-aside funding to: maintain source water assessment, wellhead protection, and source water protection programs; assist economically disadvantaged communities in meeting drinking water standards; and apply a capacity assessment program for all new and existing community and nontransient, noncommunity water supplies.

Goal: *Continue use of the DWSRF program.*

EGLE will continue to use effective outreach methods such as: direct mail, electronic media, newsletter publication, and informational meetings and conferences to publicize and encourage the use of the DWSRF to meet the infrastructure needs of communities.

In order to accomplish the long-term goals, we must also focus on more immediate objectives. Therefore, our short-term goals in FY 2020 are:

Goal: *Secure Michigan's full share of federal funding and to expeditiously obligate these monies, along with the state contribution.*

EGLE has prepared and identified on the FY 2020 PPL all projects that are willing and able to progress to loan closing consistent with a project milestone schedule for the construction of eligible facilities. All projects receiving DWSRF funds in FY 2020 will issue a Notice to Proceed within 60 days of the loan closing.

Goal: *Ensure that the additional requirements of the 2019 capitalization grant is met, including those that are imposed on local borrowers.*

Congress mandated that 20 percent of the 2019 capitalization grant be provided as additional subsidy to borrowers and an additional six to 35 percent be provided as principal forgiveness for disadvantaged communities. As EGLE recognizes the challenges imposed by the new Michigan Lead and Copper Rule, the 20 percent mandated subsidy will be divided between disadvantaged communities and communities undertaking lead service line replacement.

EGLE will also provide 15 percent of the required disadvantaged community subsidy resulting in just over 30 percent of the capitalization grant awarded as principal forgiveness to disadvantaged communities. Congress requires all DWSRF projects funded in FY 2020 to pay their workers the federal Davis-Bacon wage rates for their job classification and comply with the American Iron and Steel and EPA signage requirements.

Goal: *Fund more projects, assist communities in completing full-length lead service line replacement projects.*

The WIFS provides financial assistance to communities addressing the private property portion of lead service line replacement projects. The signing of the Michigan Lead and Copper Rule will likely result in communities undertaking more lead service line replacement projects.

V. ALLOCATION OF FUNDS

The establishment of a fundable range for any given fiscal year entails a series of steps that culminate in a determination of how much fund resources could support. Using a series of assumptions (DWSRF loan rate, return on investment rates, and level of capitalization) the process for FY 2020 is outlined below:

1. EGLE reviewed the total amount of loans committed through September 30, 2019.

Total loan commitments through 9/30/2019	\$1,074,135,000
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2. EGLE assumes that the new federal capitalization grant and the appropriated state match will remain constant until 2020. However, it should be noted that EGLE has **no assurance** of state general fund monies to match federal funds beyond the 2019 capitalization grant. Five million dollars of general funds is available for use in FY 2020 to match the 2019 capitalization grants. Remaining state match needed will come from carry over funds from past years. Michigan was appropriated \$27,011,000 in DWSRF federal capitalization grant funds for use in FY 2020.

2019 capitalization grant for loans (total grant is \$27,011,000)	\$18,637,590
General fund match	\$5,000,000
Carry forward match	\$402,200

3. EGLE then looked at how much the DWSRF could support using a five-year financial forecast at varying capitalization levels and interest rates.

The PPL has 40 projects, totaling \$530 million. Twenty-three projects, totaling \$258 million, would like to proceed with construction in FY 2020. Sixteen projects, totaling \$272 million, will be considered for funding future years.

The provision of additional subsidy is a requirement of the capitalization grant and Safe Drinking Water Act. The FY 2019 capitalization grant requires 20 percent of the capitalization grant be provided as additional subsidization. An additional six to 35 percent of subsidization is required to be provided to disadvantaged communities per the Safe Drinking Water Act. The total additional subsidy will not exceed \$9,710,000 in FY 2020 and will be awarded as principal forgiveness. The additional subsidy will be provided to projects with disadvantaged community status and to applicants undertaking lead service line replacement work. When principal forgiveness is provided from available loan proceeds to projects, it reduces the amount of the assets returning to the DWSRF as loan repayments, which could be used to make future loans. Total principal forgiveness awarded in FY2020 is approximately 50 percent greater than total principal forgiveness awarded in FY2019.

Fifteen percent of the required 20 percent additional subsidy plus, approximately fifteen percent of required subsidy for disadvantaged communities, for a total of \$8,321,400 in principal forgiveness, will be provided to disadvantaged communities. The amount

allocated to each disadvantaged community will be approximately nine percent of estimated project costs as follows:

Table 1

Disadvantaged Communities		
Community	Estimated Loan Amount	Principal Forgiveness
Detroit (DWSD)	\$57,500,000*	\$5,175,000
Highland Park	\$18,460,000	\$1,661,400
Benton Harbor	\$4,465,000	\$401,850
Muskegon	\$6,095,000	\$548,550
South Haven	\$780,000	\$70,200
Owosso	\$5,160,000	\$464,400
Total	\$92,460,000	\$8,321,400

* Total of project numbers of 7460-01 and 7483-01

Approximately five percent of the required 20 percent subsidy, for a total of \$1,387,952 will be provided to communities undertaking full length lead service line replacement as follows:

Table 2

Lead Service Line Replacement (LSLR)		
Community	Estimated LSLR Construction Cost	Principal Forgiveness
Kalamazoo	\$12,652,350	\$1,265,235
Lake Orion	\$443,000	\$44,300
Marquette	\$389,173	\$38,917
St. Joseph	\$75,000	\$7,500
White Pigeon	\$185,000	\$18,500
Rochester	\$135,000	\$13,500
Total	\$13,879,523	\$1,387,952

Each state may transfer 33 percent of available funds between the CWSRF and the DWSRF programs. Michigan does not propose to transfer funds between the CWSRF and DWSRF programs in FY 2020.

VI. CRITERIA AND METHOD FOR DISTRIBUTION OF FUNDS - SET-ASIDES

EGLE has established the set-asides and requests funding for each set-aside based on what is needed to effectively administer the public drinking water programs, to enhance public health protection, and the protection of surface and ground waters through additional non-regulatory programs, projects, and activities. In recent years, EGLE has become more dependent on the funding provided by the set-asides to fund the staff needed to effectively administer the programs because the federal Public Water Supply Supervision grant awards have not increased to cover the costs of additional work required to implement several new federal drinking water regulations nor for inflation.

In FY 2019, the DWEHD workload continued to increase. This is due to activities such as our response to the statewide Per- and Polyfluoroalkyl Substances (PFAS) sampling effort, and preparation and education to implement the new Michigan Lead and Copper Rule. The

DWEHD continues to need additional staff resources to adequately oversee water system compliance and be involved with the development of information technology projects, with the mission of protecting public health.

Each year Michigan is required to submit detailed work plans to the EPA for approval describing how each set-aside fund will be expended or the amount to be reserved. Work plans for the FY 2020 set-asides will be submitted to the EPA in late summer-early fall 2019.

Administration

Up to 4 percent of the federal capitalization grant can be used to administer the fund. Michigan intends to utilize the full 4 percent from the 2019 grant which is \$1,080,440. Any funds not utilized in FY 2020 will be retained on account for administration costs in future years.

Small Systems Technical Assistance

EGLE is requesting two percent of the 2019 grant, or approximately \$540,220 for small system technical assistance. These funds will support staff that provide technical assistance to small public water systems. This work includes, but is not limited to:

- Provide technical assistance to local health department (LHD) staff responsible for implementation of the Noncommunity Water Supply (NCWS) program in Michigan.
- Assist LHD staff in providing direct technical assistance to NCWS owners and operators, registered well drillers, and pump installers.
- Oversee the work conducted by the LHDs to implement the NCWS program throughout Michigan.
- Assist small nontransient, noncommunity public water supplies, formerly on an arsenic bottled water agreement, gain compliance with the arsenic maximum contaminant level by installing water treatment systems or using some other compliance option.
- Review engineering plans and issue permits for treatment systems at NCWSs. Provide direct assistance to small public water supplies that are exploring treatment options for PFAS.
- Provide direct assistance to small public water systems that employ treatment to comply with drinking water standards, primarily those that treat for arsenic and for nitrates.
- Provide direct assistance to facilities that are exploring or have installed secondary treatment for public health purposes therefore becoming a small public water supply.
- Conduct one-on-one or group technical training for LHD staff, NCWS owners and operators, and other stakeholders involved in the operation and maintenance of small systems. This technical training typically focuses on:
 - Sampling and monitoring practices;
 - Completing the preliminary Distribution System Materials Inventory (DSMI) under the Michigan Lead and Copper Rule.
 - Performing Revised Total Coliform Rule Level 1 assessments and Seasonal Start Up Procedures;
 - Compliance with NCWS regulations or Michigan's well construction code;
 - Investigatory techniques used to identify a problem with a NCWS or well and remedies to correct a given problem;
 - Cross connection control, including proper use and maintenance of control devices; and
 - Properly completing and submitting all required documentation or certifications, such as monthly operation reports.

- Assist LHD, NCWS, and consultants involved with the development and operation of small systems with understanding rule and code requirements to improve compliance rates.
- Draft technical guidance documents, fact sheets, brochures, or forms that can be used by the LHDs or distributed to NCWSs, well drillers, and pump installers to help improve or maintain compliance with applicable regulations.
- Administer Michigan's NCWS database, WaterTrack.
- Provide clerical, managerial, and administrative support to the scientific and engineering staff performing the activities listed above.

In addition, the funds in this set-aside will be used in FY 2020 for the following program activities:

- Training for the LHD staff responsible for implementation of the NCWS program in Michigan.
- Ongoing maintenance of the database system, WaterTrack, which houses all the NCWS program data.

Program Set-Asides

EGLE is requesting funds for one state program management set-aside in the 2019 grant, the Public Water System Supervision Program. The following is a breakdown of the projected amount:

Public Water System Supervision

EGLE requests \$2,701,100, or 10 percent of the 2019 grant, to support staff and the existing scope of the CWSS Public Water System Supervision Program. This work includes, but is not limited to:

- Maintain an inventory of public water supplies in Michigan.
- Provide compliance assistance to public water supplies.
- Implement a centralized approach to the oversight of surface water treatment of public water supplies.
- Conduct sanitary surveys and surveillance visits at public water supplies.
- Issue permits for new construction or for modifications.
- Assess public water supply compliance with the federal SDWA, the National Primary Drinking Water Standards, Michigan's Safe Drinking Water Act, 1976 Public Act 399, as amended (Act 399), and the Administrative Rules.
- Initiate escalated enforcement actions, when indicated, to compel a public water supply to comply with applicable federal and state drinking water regulations.
- Maintain program data and submit reports to the EPA as required.
- Maintain a drinking water operator training and certification program.
- Draft Michigan's Annual Capacity Development Report and the Triennial Capacity Development Report to the Governor.
- Provide clerical, managerial, and administrative support to the scientific and engineering staff performing the activities listed above.

The funds in this set aside will be used to support local health departments with noncommunity water supply compliance assistance program work.

Wellhead Protection (Section 1452(k))

EGLE is requesting \$1,350,550 for the Wellhead Protection set-aside from the 2019 grant, approximately 5 percent of the 2019 grant. The amount requested will be used to support staff responsible for the following work:

- Prioritize efforts relative to emerging issues such as PFAS in groundwater to ensure a more robust dataset for decision making and public health protection.
- Update and distribute technical guidance related to PFAS contamination in drinking water from groundwater supplies, including fact sheets, information for distribution to stakeholders and the public, including communication routes like the MI Environment Web site.
- Provide training and oversight to Michigan Geological Survey in their work (contracted using state funds) to enter well construction records into Wellogic. Begin developing a durable and ongoing process for quality control and quality assurance of information entered into Wellogic.
- Manage and maintain Wellogic, Michigan's on-line water well data system.
- Update the Source Water Assessments (SWA) for Community Water Supplies and Noncommunity Water Supplies. Provide education and outreach on wellhead protection, including providing delineations of wellhead protection areas to community water supplies and nontransient noncommunity water supplies. This will utilize management and other tools as they become available.
- Review and process SWAs submitted by the LHDs. DWEHD technical staff will track the updates and determine if the nontransient NCWSs qualify for substantial implementation of source water protection activities.
- Attend ongoing training, tools and trends in areas of groundwater protection and source evaluations, including new GIS technologies.
- Review and approve traditional wellhead delineations submitted by community water supplies.
- Administer the wellhead protection matching grant program to local communities.
- Register well drillers and pump installers to ensure they are qualified to construct wells or install well equipment, according to Michigan's well construction code requirements.
- Ensure wells are constructed to code, initiate enforcement for compliance, or revoke registrations from a well driller or pump installer when necessary.
- Administer the Abandoned Well Management Program.
- Collaborate on issues, training, and projects identified by members of the Director's WaterWell Advisory Committee formed in 2015.
- Provide technical training and assistance to public water supplies, LHD's, well drillers, pump installers, and septage waste haulers.
- Provide clerical, managerial, and administrative support to the scientific and engineering staff performing the activities listed above.
- Administer the On-site Wastewater Program, including evaluating each LHD's on-site wastewater program for consistency and assurance that minimum program requirements are met.
- Promote the need for a statewide sanitary code and assist with efforts to promulgate one.
- Review construction plans and issuance of permits for on-site wastewater installations or modifications at campgrounds to ensure site suitability, installation and operation.
- Evaluate and approve the use of new technologies for treatment of on-site wastewater.
- Administer the Septage Waste Program, including the licensing of septage waste haulers and permitting land application sites.

In addition, the funds in this set-aside will be used for the following program activities:

- Implementation of wellhead protection activities.
- Maintenance of the Wellogic database software.
- Subscription to EQuIS, an electronic data management system and decision support system. EQuIS is currently the solution for EGLE to gather, handle, and store PFAS drinking water data collected from public water supplies.
- Grants to local communities to increase source water protection efforts and initiatives. EGLE plans to utilize approximately \$400,000 from the 2019 Wellhead Protection Set-Aside to provide the state funding for these 50/50 match grants.
- Water well construction technical training for LHD staff.
- Onsite wastewater technical training for LHD staff.
- DWEHD is partnering with American Water Works Association, Michigan State University Institute of Water Research, and Michigan Rural Water Association to host a Source Water Protection Conference on October 29-30, 2019. This conference will provide opportunities to learn about management options for source water protection and steps public water supplies can take to develop or enhance an existing program. Designed for communities and public water supplies, attendees will learn about a variety of important topics that include ground and surface water protection issues, wellhead protection, risk communication, funding initiatives, emerging contaminants and state program updates. Participants will have the opportunity to identify the challenges and opportunities that communities are facing as they work to update existing source water protection programs and implement new and innovative concepts, strategies and technologies. This conference is intended for community water supply personnel, local officials, community representatives, local, state and federal partners, consultants, service providers, and those with an interest in source water protection.

Local Assistance for Capacity Development (Section 1452(k))

EGLE is requesting approximately \$2,701,100 or 10 percent of the 2019 grant, for the Local Assistance for Capacity Development Set-Aside for staff and other source water protection activities. The staff funded by this set-aside are responsible for providing direct technical assistance to public water supplies to enhance and maintain their technical, managerial and financial capabilities. Specific duties include:

- Assist public water supplies in acquiring and maintaining capacity as outlined in Michigan's Capacity Development Strategy for Existing Water Systems, dated August 1, 2000.
- Educate public water supplies about the Surface Water Intake Grant Program and provide assistance to surface water systems in the development and implementation of a Surface Water Intake Protection Program Plan.
- Continue and expand the implementation of source water select cyanotoxin screening and source water assessment methodology for surface water sources. Surface water sources utilized will be sampled at least once per month from July through October 2019. State of Michigan Renew Michigan Funding will be utilized for sample collection and analysis. Raw and finished water samples will be collected. The samples will be analyzed for microcystins and nodularins, cylindrospermopsin, and anatoxin-a. The set-aside funds will be utilized to provide technical assistance to supplies, including prompt assistance if any cyanotoxins are detected in the raw or finished tap. Water data will be reviewed as it becomes available with public health protection as the primary objective. In FY 2020, when the sampling effort concludes, the complete data set of this voluntary sampling effort will be reviewed for successes, improvements, and lessons learned in an effort to continue to receive support for this sampling.

- Provide technical guidance related to PFAS detections in surface water systems. The State of Michigan is funding sampling of all that utilize surface water for PFAS at least once per month from May through October 2019. Raw and finished water samples will be collected. Data will be reviewed as it becomes available with public health protection as the primary objective. In FY 2020, when the sampling effort concludes, the complete data set from this voluntary sampling effort will be reviewed for successes, improvements, and lessons learned to help public water systems determine next steps.
- Assist public water supplies vulnerable to PFAS, including providing information on treatment technologies, alternate sources, additional sampling, education, and communication.
- Coordinate with other departmental programs and state and federal agencies in the development and integration of drinking water protection strategies. In particular this includes EGLE Water Resources Division, EGLE Remediation and Redevelopment Division, and Department of Health and Human Services on lead, PFAS and HABs. This coordinated approach benefits both the public water supplies and the public.
- Provide extensive training for new and existing staff, including continuation of the successful "Rule School" series to provide an in-depth review of the Act 399 Rules; a rolling six-week series of new analyst training; and an extensive training series on engineering topics in both classroom and hands-on settings. These trainings, in addition to outside training for staff, are positively impacting the consistency and technical expertise available to the regulated community.
- Educate water supplies and operators on the new Michigan Lead and Copper Rule requirements, including inventory, sampling, corrosion control optimization and lead service line removal.
- Receive and review monitoring data and make associated compliance determinations in a consistent and coordinated manner. Educate water supplies about proper sampling methodologies and the timely and complete submittal of data to ensure that any exceedances are addressed.
- Provide guidance to assist supplies in preparing required reports to ensure that they meet regulations.
- Conduct sanitary surveys within the required timeframes.
- Conduct plan reviews for source changes and water supply improvements.
- Perform source water assessments at CWSs.
- Provide one-on-one technical assistance and consultation with water supply personnel to assist in the understanding of, and compliance with, state and federal requirements.
- Review asset management plans, general plans, reliability studies, and engineering studies to assure regulatory compliance and optimum performance.
- Provide cross connection control guidance and training and continue to assist CWS with the development of residential cross connection programs.
- Continue staff involvement in operator training classes to enhance the Operator Certification and Training Program.
- Explore innovative methods to reach water supply owners and operators to promote greater long-term compliance, including the use of one-minute videos on YouTube.
- Provide reminder letters for compliance activities.
- Provide emergency response training to internal staff, with subsequent follow-up to water supplies.

In addition, the funds in this set-aside will be used for the following program activities:

- Continue the surface water intake protection program.
- Determine if new community water supplies meet the financial adequacy requirements of the capacity development program.
- Reimburse LHDs for updating source water assessments at nontransient NCWSs.

- Reimburse LHDs for performing capacity assessments at new or existing nontransient NCWSs.
- Reimburse LHDs for performing annual site visits in situations where the noncommunity public water supply provides treatment for public health purposes.
- Purchase Field Analysis Equipment and Technical Assistance Reference Materials. These will be available to district staff for technical assistance and training to public water supplies.

VII. CRITERIA AND METHOD FOR DISTRIBUTION OF FUNDS - PROJECT LOANS

Michigan's DWSRF will commit loans for qualified projects based on project plans that were submitted to WIFS by May 1, 2019. Plans were reviewed by EGLE staff to ensure compliance with Section 5405 of Act 451, before being placed on the PPL for FY 2020. The DWSRF, to the maximum extent practicable, must give priority to projects that:

- address the most serious risks to human health;
- are necessary to ensure compliance with the requirements of the federal SDWA; and
- assist systems most in need according to the state's affordability requirements.

Michigan's priority system takes these factors into account in the assignment of priority points. Acute violations receive a larger number of points than any other category. In fact, standard compliance offers over 41 percent of a project's total possible points. All factors point to the need for the project to comply with federal drinking water requirements. Affordability is addressed by the award of additional points for disadvantaged community status and is the ultimate tiebreaker. Michigan's priority point system is detailed in Section 5406 of Act 451.

The FY 2020 draft DWSRF PPL is included as part of the IUP and was presented as part of the public hearing on August 21, 2019.

Section 1452(a)(2) of the federal SDWA requires the state to first make available 15 percent of all funds annually credited to the DWSRF for financial assistance to water suppliers serving fewer than 10,000 persons. For the 2019 capitalization grant, Michigan must reach or exceed \$4,051,650 to satisfy this requirement.

All projects are reviewed and scored based upon the priority point system outlined in Part 54 of Act 451. Funds are made available for commitment based on the priority ranking and projects will only be funded out of order to satisfy requirements for small community assistance.

Employing the criteria found in Section 5415 of Act 451, the EGLE Director has set the interest rate at 2.0 percent for FY 2020. The term of the loans will run up to 20 years for most projects. Those suppliers meeting disadvantaged community criteria will, however, be able to extend their terms up to 30 years, if desired.

Part 54 of Act 451 also permits suppliers serving less than 10,000 persons to receive reimbursement of project planning costs upon delivery of an approvable project plan to EGLE. Legislation has been passed to provide a funding mechanism for this reimbursement. Interim planning loans first became an option for DWSRF applicants in FY 2001.

VIII. DISADVANTAGED BUSINESS ENTERPRISE

Beginning October 1, 2009, EGLE implemented the EPA's Disadvantaged Business Enterprise (DBE) Rule (40 CFR Part 33). The DBE rule applies specifically to ANY procurement made utilizing EPA financial assistance. The EPA financial assistance includes DWSRF funding. The DBE rule changed substantially from the prior Minority Business Enterprise (MBE) and Women's Business Enterprises (WBE) rule. The DBE rule requires that MBE and WBE firms be certified. Certification

applies to enterprises that are at least 51 percent owned and/or controlled by socially and economically disadvantaged individuals who are of good character, are citizens of the United States, and have an initial and continued personal net worth of less than \$750,000.

DBE requirements apply to EGLE, DWSRF loan recipients, and the loan recipient's prime contractors. Additional information regarding the DBE requirements is available on EGLE's DWSRF website (<http://www.michigan.gov/drinkingwaterrevolvingfund>).

IX. DISADVANTAGED COMMUNITY STATUS

Disadvantaged community status is determined by EGLE based on information submitted with a water supplier's project plan. To qualify, an applicant must first meet the definition of "municipality" found in Part 54 of Act 451. Next, the updated median annual household income (MAHI) of the area to be served must be less than 120 percent of the state's updated MAHI. Finally, the costs of the project must be borne by the customers in the service area. If costs are spread over a larger area, then that area must demonstrate that it meets the poverty or affordability criteria.

Once these conditions are met, a community will be awarded the disadvantaged community status if one of the following is true:

- More than 50 percent of the area to be served by the proposed project is identified as a poverty area by the U.S. Census Bureau.
- The updated MAHI of the area to be served is less than the most recently published federal poverty guidelines for a family of four in the contiguous United States.
- The updated MAHI is less than the updated statewide MAHI and the annual user costs for water supply exceed 1 percent of the service area's MAHI.
- The updated MAHI is more than the updated statewide MAHI and the annual user costs for water supply exceed 3 percent of the service area's MAHI.

The major benefits for qualified communities include 50 additional priority points, extension of loan terms to 30 years principal forgiveness and assistance to help defray the costs of preparing project plans if the population is less than 10,000.

A complete discussion of the disadvantaged community status may be found in a guidance document prepared by EGLE to explain how a supplier can achieve the status and benefit from it. WIFS staff encourages all applicants to supply the pertinent data to allow EGLE to perform a disadvantaged community status analysis.

X. EPA AUTOMATED CLEARINGHOUSE ACTIVITIES

The EPA employs an Automated Standard Application for Payments (ASAP) system to make disbursements of federal funds. Michigan will comply with this system's requirements and deposit funds drawn from it into appropriate accounts set up for the DWSRF.

Beginning in the 1st quarter of FY 2020, Michigan anticipates drawing capitalization grant funds from the ASAP system. Michigan will draw 100 percent state funds first followed by the federal funds.

XI. ASSURANCES

The final guidelines from the EPA set forth provisions that the state must provide certain assurances in order to qualify for capitalization grant funding. Such assurances are incorporated into the Operating Agreement and are included here by reference. EGLE has a Quality Management Plan that guides our selection of qualified staff, and that the relevant staff is in place to work on DWSRF projects. DWSRF project information will continue to be provided to the EPA via the Drinking Water Project & Benefits Reporting (PBR) and the National Information Management

System (NIMS). All projects funded in FY 2020 will meet the equivalency requirements for crosscutter review and Federal Funding Accountability & Transparency Act (FFATA).

XII. OUTPUT/OUTCOME MEASURES

To comply with the EPA requirements on Environmental Benefits of the DWSRF, Michigan estimates that the following outputs could result from project loans in FY 2020 (including any projects noted as future on the PPL):

- A. Output: Michigan could fund approximately 34 drinking water transmission/ distribution loans to construct/rehabilitate/upgrade drinking water transmission and distribution systems across the state. The dollar amounts of these applications total approximately \$479 million.
- Outcome: The funding of these projects could result in more people receiving improved drinking water from existing treatment systems in Michigan.
- B. Output: Michigan could fund approximately ten drinking water treatment projects to construct and/or rehabilitate drinking water treatment facilities across the state. The dollar amount of these application total approximately \$22 million.
- Outcome: The funding of these projects could result in improved drinking water for thousands of people in Michigan and upon completion of the project, facilities that meet all applicable permits and SDWA requirements.
- C. Output: Michigan could fund approximately two drinking water storage projects to construct and/or rehabilitate drinking water storage facilities across the state. The dollar amount of the application totals approximately \$1.6 million.
- Outcome: The funding of this project could result in the improved drinking water and storage facilities that meet all applicable permits and SDWA requirements.
- D. Output: Michigan could fund one drinking water source project to construct and/or rehabilitate drinking water source facilities across the state. The dollar amount of the application totals approximately \$745,285.
- Outcome: The funding of this project could result in more people receiving improved drinking water from a new or rehabilitated water source that meets all applicable permits and SDWA requirements.

Please note that the number of applications will not agree with the number of loans on the PPL, as many of the project loans include work in more than one category (i.e., transmission/distribution, treatment, storage, and source).

XIII. PUBLIC REVIEW AND COMMENT

In order to satisfy public participation requirements, EGLE held a public hearing to discuss the DWSRF draft IUP on August 21, 2019. The hearing was publicly noticed in the *Detroit Legal News*, the *Lansing State Journal*, and the *Marquette Mining Journal*; posted on the EGLE calendar of events; mailed to all persons and engineering firms on our mailing list; and individually noticed to each water supplier on the FY 2020 draft PPL. These sources promote the hearing to ensure maximum public input from those interested in the DWSRF. The hearing affords stakeholders and other interested parties an opportunity to hear and comment on how EGLE plans to disburse the DWSRF loan funds.

Questions about the DWSRF IUP may be directed to:

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Water Infrastructure Financing
Finance Division
Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957
Voice: 517-284-5433
E-mail: GreenK1@Michigan.gov

Other contacts for the DWSRF are:

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Drinking Water and Environmental Health Division Department
of Environment, Great Lakes, and Energy
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Lansing, Michigan 48909-8311
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Ms. Deborah M. Roberts, Executive Director Michigan
Finance Authority
Michigan Department of Treasury
P.O. Box 15128
Lansing, Michigan 48922
Voice: 517-241-2432
E-mail: TreasMFA@Michigan.gov

XIV.ORIGINATION OF DOCUMENTS

EGLE is responsible for issuing the DWSRF IUP and its accompanying information.



Department of Environment, Great Lakes and Energy

Current PPL

DWRF

Rank	Project #	Project Name, Location and Description		Population	Total Points	Binding Com Date	Binding Com Amount	
PROJECTS WITH PRIOR YEAR SEGMENTS								
1	7473-99	City of Highland Park	Wayne County	Future wm repl phases, Islr	11,398	465	Future	\$81,525,000
2	7461-02	GLWA	Oakland County	14 Mile Rd Trans Main Loop, Ph 2	3,600,000	400	Future	\$46,000,000
3	7445-02	GLWA	Wayne County	Northeast Trans Main, Phase 2	3,600,000	375	08/07/2020	\$92,030,000
3	7445-03	GLWA	Wayne County	Northeast Trans Main, Phase 3	3,600,000	375	Future	\$50,320,000
PROJECTS WITHOUT PRIOR YEAR SEGMENTS								
4	7464-01	City of Benton Harbor	Berrien County	wm repl, Islr, elev strg imp	10,020	615	05/19/2020	\$4,465,000
5	7482-01	City of Kalamazoo	Kalamazoo County	wm repl & ext, lead sl repl	144,500	525	02/28/2020	\$22,700,000
6	7458-01	City of Owosso	Shiawassee County	wm replac, Islr	14,539	515	Future	\$12,975,000
7	7457-01	City of Owosso	Shiawassee County	elev strg imp, WTP imp, wm repl	14,539	490	02/28/2020	\$3,500,000
8	7473-01	City of Highland Park	Wayne County	wm replac, Islr phase 1	11,398	465	05/19/2020	\$14,020,000
9	7418-01	City of Muskegon Heights	Muskegon County	Watermain & meter replacement	10,800	465	Future	\$5,735,000
10	7436-01	City of St. Joseph	Berrien County	Wm replac, Islr	33,000	465	02/28/2020	\$1,750,000
11	7470-01	City of Howell	Livingston County	W. Grand River watermain repl	9,203	430	Future	\$2,675,000
12	7469-01	City of Howell	Livingston County	Clinton St. watermain repl	9,203	430	Future	\$1,400,000
13	7462-01	City of Howell	Livingston County	WTP & well improv, wm repl	9,203	430	05/19/2020	\$975,000
14	7480-01	Spring Arbor Township	Jackson County	New wellfield, wm ext	2,100	420	02/28/2020	\$3,370,000
15	7426-01	City of Rochester	Oakland County	Watermain replacement & transm	13,660	415	02/28/2020	\$5,950,000
16	7466-01	City of Muskegon	Muskegon County	WFP impr, PS impr, wm & Isl repl	38,500	415	08/07/2020	\$6,095,000
17	7468-01	City of Muskegon	Muskegon County	WFP chem feed, wm & Isl repl	38,500	415	Future	\$4,130,000
18	7467-01	City of Muskegon	Muskegon County	WFP impr, wm & Isl repl	38,500	415	Future	\$3,035,000
19	7442-01	East Lansing	Ingham County	WTP filt add & controls	79,585	400	Future	\$2,900,000
20	7441-01	East Lansing	Ingham County	HVAC upgrd	79,585	400	05/19/2020	\$1,135,000
21	7461-01	GLWA	Oakland County	14 Mile Rd Trans Main Loop, Ph 1	3,600,000	400	05/19/2020	\$8,400,000
22	7430-01	Village of Lake Orion	Oakland County	Watermain replacement Ph 3 & 4	3,032	395	05/19/2020	\$4,390,000
23	7460-01	DWSD/GLWA	City of Detroit, Wayne County	Wm replac, Islr	650,000	375	05/19/2020	\$32,635,000
24	7483-01	DWSD/GLWA	City of Detroit, Wayne County	wm replac, Islr	650,000	375	05/19/2020	\$24,865,000
25	7463-01	City of South Haven	Van Buren County	Wm replac, Islr	11,650	340	11/15/2019	\$1,210,000
26	7452-01	Livonia	Wayne County	WM repl (Project Area #1-3)	96,942	325	05/19/2020	\$10,525,000

Project Type: DWRF Loan Fiscal Year: 2020 Include 4th Quarter From Previous FY: No

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Department of Environment, Great Lakes and Energy

Current PPL

DWRP

27	7434-01	City of Dearborn	Wayne County	Watermain replacement Area 1 20	100,000	325	Future	\$8,000,000
28	7453-01	Livonia	Wayne County	WM repl (Project Area #4-6)	94,060	325	Future	\$5,300,000
29	7454-01	Livonia	Wayne County	WM repl (Project Area #7-9)	94,060	325	Future	\$4,815,000
30	7433-01	City of Dearborn	Wayne County	Watermain replacement area 1	100,000	325	Future	\$4,500,000
31	7435-01	City of Dearborn	Wayne County	Watermain replacement area 2	100,000	325	Future	\$3,500,000
32	7472-01	City of Ann Arbor	Washtenaw County	UV disinf	125,000	325	11/15/2019	\$3,100,000
33	7437-01	City of St. Joseph	Berrien County	WTP improvement, watermain repla	33,000	315	Future	\$35,565,000
34	7459-01	Charter Township of Port Huron	St. Clair County	wm replac	10,654	315	08/07/2020	\$6,215,000
35	7425-01	City of Fraser	Macomb County	Watermain repl, PRVs	14,084	315	02/28/2020	\$3,800,000
36	7479-01	Charter Township of White Lake	Oakland County	Iron filtration	6,000	305	08/07/2020	\$3,615,000
37	7465-01	Village of White Pigeon	St Joseph County	Wm replac, Isl replac	1,530	295	05/19/2020	\$1,665,000
38	7481-01	City of Marquette	Marquette County	wm replac	24,500	240	05/19/2020	\$1,995,000
Total 39 Projects								\$530,780,000



Department of Environment, Great Lakes and Energy

Drinking Water Revolving Loan Fund PPL Scoring

Category Description	Points	7418-01	7425-01	7426-01	7430-01	7433-01	7434-01	7435-01	7436-01	7437-01	7439-01	7441-01	7442-01	7445-02	7445-03	7452-01
Drinking Water System Compliance Total	450 (max)	150	150	150	150	150	150	150	150	150	0	150	150	150	150	150
Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	250															
Non-Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	200															
Facility Upgrade to Maintain Compliance	150	■	■	■	■	■	■	■	■	■		■	■	■	■	■
Aesthetic Upgrades to Maintain Compliance	25															
Infrastructure Improvements/Upgrades - Total	350 (max)	125	25	125	125	25	25	25	175	25	0	100	100	75	75	25
Source/Treatment with Connecting Mains	125 (max)	125	0	0	0	0	0	0	125	0	0	100	100	0	0	0
Meet Minimum Capacity	100	■							■							
Reliability	75	■							■			■	■			
Other Upgrades	25	■							■			■	■			
Enforcement Action	25															
Source Water Protection	50															
Transmission/Distribution Mains	125 (max)	0	25	125	125	25	25	25	25	25	0	0	0	75	75	25
Meet Minimum Capacity	100			■	■											
Reliability	75													■	■	
Other Upgrades	25		■	■	■	■	■	■	■	■						■
Enforcement Action	25															
Storage Facilities/Pumping Stations	125 (max)	0	0	0	0	0	0	0	25	0	0	0	0	0	0	0
Meet Minimum Capacity	100															
Reliability	75															
Other Upgrades	25								■							
Enforcement Action	25															
Population - Total	50 (max)	40	40	40	20	50	50	50	40	40	0	50	50	50	50	50
0 - 500	10										■					
501 - 3,300	20				■											
3,301 - 10,000	30															
10,001 - 50,000	40	■	■	■					■	■						
> 50,000	50					■	■	■				■	■	■	■	■
Disadvantaged Community - Total	50 (max)	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Granted	50	■														
Consolidation - Total	100 (max)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Achieve Compliance	100															
Correct Deficiencies	60															
Other	40															
Comp. Wellhead/Source Water Protect Plans - Total	100 (max)	100	100	100	100	100	100	100	100	100	0	100	100	100	100	100
Granted	100	■	■	■	■	■	■	■	■	■		■	■	■	■	■
Total Priority Points Assigned	1000 (max)	465	315	415	395	325	325	325	465	315	0	400	400	375	375	325

Fiscal Year: 2020

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Department of Environment, Great Lakes and Energy

Drinking Water Revolving Loan Fund PPL Scoring

Category Description	Points	7453-01	7454-01	7457-01	7458-01	7459-01	7460-01	7461-01	7461-02	7462-01	7463-01	7464-01	7465-01	7466-01	7467-01	7468-01
Drinking Water System Compliance Total	450 (max)	150	150	150	150	150	150	150	150	150	150	350	150	150	150	150
Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	250															
Non-Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	200											■				
Facility Upgrade to Maintain Compliance	150	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Aesthetic Upgrades to Maintain Compliance	25															
Infrastructure Improvements/Upgrades - Total	350 (max)	25	25	200	225	125	25	100	100	150	100	175	125	75	75	75
Source/Treatment with Connecting Mains	125 (max)	0	0	75	75	0	0	0	0	25	0	0	0	25	25	25
Meet Minimum Capacity	100															
Reliability	75			■												
Other Upgrades	25				■					■				■	■	■
Enforcement Action	25															
Source Water Protection	50				■											
Transmission/Distribution Mains	125 (max)	25	25	125	125	125	25	100	100	125	100	125	125	25	25	25
Meet Minimum Capacity	100			■	■	■				■		■	■			
Reliability	75			■	■			■	■		■					
Other Upgrades	25	■	■	■		■	■	■	■	■	■		■	■	■	■
Enforcement Action	25											■				
Storage Facilities/Pumping Stations	125 (max)	0	0	0	25	0	0	0	0	0	0	50	0	25	25	25
Meet Minimum Capacity	100															
Reliability	75															
Other Upgrades	25				■							■		■	■	■
Enforcement Action	25											■				
Population - Total	50 (max)	50	50	40	40	40	50	50	50	30	40	40	20	40	40	40
0 - 500	10															
501 - 3,300	20												■			
3,301 - 10,000	30									■						
10,001 - 50,000	40			■	■	■					■	■		■	■	■
> 50,000	50	■	■				■	■	■							
Disadvantaged Community - Total	50 (max)	0	0	0	0	0	50	0	0	0	50	50	0	50	50	50
Granted	50						■				■	■		■	■	■
Consolidation - Total	100 (max)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Achieve Compliance	100															
Correct Deficiencies	60															
Other	40															
Comp. Wellhead/Source Water Protect Plans - Total	100 (max)	100	100	100	100	0	100	100	100	100	0	0	0	100	100	100
Granted	100	■	■	■	■		■	■	■	■				■	■	■
Total Priority Points Assigned	1000 (max)	325	325	490	515	315	375	400	400	430	340	615	295	415	415	415

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Department of Environment, Great Lakes and Energy

Drinking Water Revolving Loan Fund PPL Scoring

Category Description	Points	7469-01	7470-01	7472-01	7473-01	7473-99	7479-01	7480-01	7481-01	7482-01	7483-01
Drinking Water System Compliance Total	450 (max)	150	150	150	150	150	175	150	150	350	150
Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	250										
Non-Acute Viol. of DW Standards, Health Advisory Levels, SWTT, Disease	200									■	
Facility Upgrade to Maintain Compliance	150	■	■	■	■	■	■	■	■	■	■
Aesthetic Upgrades to Maintain Compliance	25						■				
Infrastructure Improvements/Upgrades - Total	350 (max)	150	150	25	125	125	0	250	50	125	25
Source/Treatment with Connecting Mains	125 (max)	25	25	25	0	0	0	125	0	0	0
Meet Minimum Capacity	100							■			
Reliability	75										
Other Upgrades	25	■	■	■				■			
Enforcement Action	25										
Source Water Protection	50										
Transmission/Distribution Mains	125 (max)	125	125	0	125	125	0	125	25	125	25
Meet Minimum Capacity	100	■	■					■		■	
Reliability	75				■	■				■	
Other Upgrades	25	■	■		■	■		■	■		■
Enforcement Action	25				■	■					
Storage Facilities/Pumping Stations	125 (max)	0	0	0	0	0	0	0	25	0	0
Meet Minimum Capacity	100										
Reliability	75										
Other Upgrades	25								■		
Enforcement Action	25										
Population - Total	50 (max)	30	30	50	40	40	30	20	40	50	50
0 - 500	10										
501 - 3,300	20							■			
3,301 - 10,000	30	■	■				■				
10,001 - 50,000	40				■	■			■		
> 50,000	50			■						■	■
Disadvantaged Community - Total	50 (max)	0	0	0	50	50	0	0	0	0	50
Granted	50				■	■					■
Consolidation - Total	100 (max)	0	0	0	0	0	0	0	0	0	0
Achieve Compliance	100										
Correct Deficiencies	60										
Other	40										
Comp. Wellhead/Source Water Protect Plans - Total	100 (max)	100	100	100	100	100	100	0	0	0	100
Granted	100	■	■	■	■	■	■				■
Total Priority Points Assigned	1000 (max)	430	430	325	465	465	305	420	240	525	375

Fiscal Year: 2020

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