

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



Michael McClellan

WSSN: 00560

August 24, 2017

Ms. Becky Schlienz, Treasurer City of Belding 120 South Pleasant Street Belding, MI 49809

Dear Ms. Schlienz:

SUBJECT:

City of Belding (Belding) - Water System Level 2 Assessment

This letter confirms Department of Environmental Quality (DEQ) staff, Wood Chooi and Jeremy Klein, water system visit with City of Belding DPW Director Mr. Ernie Thomas on August 7, 2017, and summarizes the subsequent review and discussion of the water supply facilities serving the City of Belding. The purpose of this meeting was to evaluate the water system following an event where more than the allowed amount of total coliform and E. Coli positive samples occurred, and with respect to the requirements of the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399). The enclosed Level 2 Assessment form was completed to gather information on the Belding water supply system.

The following table summarizes our findings from our assessment of the water system:

| Assessment Area | Findings |
|--|---------------------------------|
| Sample Site Selection and Sample Collection | No Deficiencies/Recommendations |
| Source-Wells | No Deficiencies/Recommendations |
| Well House or High/Low service Pump House | Recommendations |
| Treatment | Recommendations |
| Storage | No Deficiencies/Recommendations |
| Distribution System | No Deficiencies/Recommendations |
| Operations and Maintenance | No Deficiencies/Recommendations |
| Other | None |

This assessment was conducted as a result of the Revised Total Coliform Rule, which took effect April 1, 2016. A Level 1 Assessment occurs when a water supply collects two or more total coliform positive samples in a month (for systems collecting fewer than forty samples per month, like Belding) or more than five percent of the system's samples are total coliform positive (for a larger system collecting more than forty samples per month). A Level 2 Assessment occurs when a water supply has an E. coli maximum contaminant level violation or when a water supply incurs a second Level 1 Assessment trigger in a 12-month period.

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On August 4, 2017, Belding triggered a Level 2 Assessment. Belding routine monthly sampling consists of untreated raw well water samples from each of the four wells that serves the water system and four routine sampling locations in the water distribution system. Two wells tested positive for total coliform bacteria and the other two wells tested positive for E. Coli. Two of the four distribution system sampling locations tested positive for total coliform bacteria and the other two sampling locations were negative for total coliform bacteria.

Prior to the Level 2 Assessment trigger, DEQ staff conducted a routine water system visit on July 28, 2017. During the visit we discussed water system operation and maintenance, and inspected the water system facilities. The water system operation and maintenance appears to be satisfactory.

There were two findings during our inspection of the water system facilities on July 28, 2017:

- 1. The four wells had their 55-gallon phosphate drum cap removed to provide a 2-inch diameter opening for insertion of a chemical suction tube inside the drum to the phosphate solution. The opening with the chemical suction tube was not covered to prevent insects or dirt to get to the phosphate solution. Of the four wells serving the water system, Well 4 phosphate tank needed the most attention as some amount of dark substance had settled at the bottom of the phosphate solution thus requiring it to be replaced with new phosphate solution.
- The well pump house's doors were rusted and some of the wood was rotted, mainly at the door bottom. Some of the rotted wood created small holes where rodents could get inside the well pump house and if a chlorine gas leak occurs, it could get outside the well pump house.

The Level 2 Assessment trigger has required DEQ to conduct another water system visit on August 7, 2017. Our review and inspection of the water system facilities is indicated in the enclosed Level 2 Assessment check list and we find that the water system operation and maintenance was satisfactory. The finding on August 7, 2017, was that the Well 4 casing vent discharge pipe outlet did not have adequate separation distance from the floor drain.

Also, two rounds of water sampling conducted on August 4 and August 5, 2017, consisting of well and distribution samples, were non-detect for total coliform bacteria and E. Coli. The issue with the phosphate day tank as indicated above; the opening with the chemical injection tubing was properly sealed. All the phosphate solution day tank for all the wells were clean and there was no chlorine feed pump failure to provide continuous chlorine treatment.

The following are three recommendations that the City of Belding needs to pursue even though these three items, we believe, are not the cause of the total coliform bacteria and E. Coli detects:

• Well 4 casing vent discharge pipe outlet has a very small air gap separating it from the floor drain. The air gap shall be at least two times the pipe diameter but not be less than one inch and needs not to be more than 12 inches. An adequate air gap is needed to ensure that the discharge pipe outlet does not get submerged under unpotable water, thus creating a cross connection. An adequate air gap for the Well 4 casing vent pipe is to be constructed by September 30, 2017.

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- The well pump house has rusted doors that have rotted wood at the door bottom. These need to be repaired or replaced by **October 31, 2017**.
- Always keep the phosphate solution clean by having no openings in the phosphate day tank that will allow insects or dirt to get to the phosphate solution.

In conclusion, we find no specific items that caused the water samples collected on August 2, 2017, to test positive for total coliform and E. Coli.

If you have any questions about the Revised Total Coliform Rule, or this assessment, please contact me at the phone number below, or by e-mail at chooiw@michigan.gov.

Sincerely,

Wood Chooi, P.E., District Engineer

Grand Rapids District Office

Drinking Water and Municipal Assistance Division

616-356-0228

WC:kw

Enclosure

cc/enc: Mr. Ernie Thomas, City of Belding

cc: District Health Department Ionia County



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF DRINKING WATER AND MUNICIPAL ASSISTANCE

LEVEL 2 ASSESSMENT FORM FOR COMMUNITY WATER SUPPLIES

Issued under authority of the Safe Drinking Water Act, 1976 PA 399, as amended, MCL 325.1001 et seq., and its Administrative Rules (Act 399).

This form must be completed as soon as possible, but no later than 30 days after the supply triggered the assessment. It must be completed by DEQ - Office of Drinking Water & Municipal Assistance staff.

| 1. General Information | |
|--|------------------------------|
| CWS Name: City of Belding | wssn: 00560 |
| DEQ Staff Completing Assessment: Wood Chooi, Jeremy Klei | n |
| Name & Title of Person Representing the CWS During Assessment: | Ernie Thomas, DPW Supervisor |
| Level 2 Trigger: E. coli MCL Or 2nd Level 1 Assessment in 1 | 2 months |
| e Assessment Triggered: 08/04/2017 Date Assessment Completed: 08/10/17 | |

| 2. Bacteriologic | al Sample Summary (Include | all results associated with | monitoring period, add additi | onal pages if necess | ary) |
|------------------|----------------------------|---|--|----------------------|------------|
| Date & Time | Location | Purpose (Routine, Repeat, Triggered, Special Purpose) | Result (ND, TC+, EC+, invalid, interference) | Collected By | Laboratory |
| 8/2/17 | 105 W State | Routine | ND | G Regan | 0020 |
| 8/2/17 | 317 E Ellis | Routine | TC+ | G Regan | 0020 |
| 8/2/17 | 1510 W State | Routine | TC+ | G Regan | 0020 |
| 8/2/17 | 120 S Pleasant | Routine | EC+ | G Regan | 0020 |
| 8/2/17 | Well 2 | Triggered | TC+ | G Regan | 0020 |
| 8/2/17 | Well 4 | Triggered | EC + | G Regan | 0020 |
| 8/2/17 | Well 5 | Triggered | TC+ | G Regan | 0020 |
| 8/2/17 | Well 1 | Triggered | EC+ | G Regan | 0020 |
| 8/2/17 | S Tower | Rouline | ND | G Regan | 0020 |
| 8/4/17 | 324 E Ellis | Repeat | ND ND | G Regan | 3950 |
| | 317 E Ellis | Repeat | ND | G Regan | 3950 |
| 8/4/17 | 304 E Ellis | Repeat | ND | G Regan | 3950 |
| 8/4/17 | 1437 W State | Repeat | ND | G Regan | 3950 |
| 8/4/17 | | Repeat | ND | G Regan | 3950 |
| 8/4/17 | 1510 W State | | ND | G Regan | 3950 |
| 8/4/17 | 1527 W State | Repeat | ND | G Regan | 3950 |
| 8/4/17 | 130 S Bridge | Repeat Repeat | ND | G Regan | 3950 |
| 8/4/17 | 120 S Pleasant | | ND | G Regan | 3950 |
| 8/4/17 | 203 Pleasant | Repeat | ND | G Regan | 3950 |
| 8/4/17 | Well 2 | Follow-up | ND ND | G Regan | 3950 |
| 8/4/17 | Well 4 | Follow-up | ND ND | G Regan | 3950 |
| 8/4/17 | Well 5 | Follow-up | ND | G Regan | 3950 |
| 8/4/17 | Well 1 | Follow-up | | G Regan | 3950 |
| 8/5/17 | 324 E Ellis | Repeat | ND ND | G Regan | 3950 |
| 8/5/17 | 317 E Ellis | Repeat | ND | | 3950 |
| 8/5/17 | 304 E Ellis | Repeat | ND | G Regan | 3950 |
| 8/5/17 | 1437 W State | Repeat | ND | G Regan | 3950 |
| 8/5/17 | 1510 W State | Repeat | ND | G Regan | |
| 8/5/17 | 1527 W State | Repeat | ND | G Regan | 3950 |
| 8/5/17 | 130 S Bridge | Repeat | ND | G Regan | 3950 |
| 8/5/17 | 120 S Pleasant | Repeat | ND | G Regan | 3950 |
| 8/5/17 | 203 Pleasant | Repeat | ND | G Regan | 3950 |
| 8/5/17 | Well 2 | Follow-up | ND | G Regan | 3950 |
| 8/5/17 | Well 4 | Follow-up | ND | G Regan | 3950 |
| 8/5/17 | Well 5 | Follow-up | ND | G Regan | 3950 |
| 8/5/17 | Well 1 | Follow-up | ND | G Regan | 3950 |

sheet what actions will be taken to determine the necessary information, including any supplemental information that needs to be provided by the water supply. Answer A. Sample Site Selection and Sample Collection Yes No NA \boxtimes Were the samples collected in accordance with the Sample Site Plan? X For positive samples, were the taps used in appropriate condition for collection? \boxtimes П For positive samples, were the taps used on a regular basis? M Did someone other than a regular sample collector collect the samples? Were proper sample collection procedures followed? (tap flushed, aerator removed, cap properly handled, 冈 П clean and sealed sample bottles used, bottles not rinsed, etc.) X Were the samples kept cool and delivered to the lab within 30 hours of collection? П 図 П Have there been any recent plumbing changes or construction at the site? X Any identified cross connections near the sample tap or premise plumbing? 冈 Is there any Point of Entry (POE) treatment units after the service line connection or in the premise? П \boxtimes Is there any Point of Use (POU) treatment units at the sample tap(s) location? Answer B. Source - Wells (if wells are not used check here _ and go to subsection C) No NA Yes Do the wells have approved and secured well caps or sanitary seals? \boxtimes П \boxtimes Are the well caps or sanitary seals vented and screened? \boxtimes Is the top of the well head at least 12-inches above grade? 冈 is the electrical conduit damaged or not sealed to the well cap? X Is the ground graded to prevent water flow towards the wells? Is there standing water or other unsanitary conditions near the wells? 図 冈 Have any wells/pumps undergone any recent repairs or maintenance activities? \boxtimes Do the wells have adequate isolation distances from sources of contamination? \boxtimes Does the raw water quality data indicate changes to the source water quality? 冈 Has the pumping capacity of the well(s) changed recently? 図 П Have there been any sewer or chemicals spills, or other disturbances near the wells? \boxtimes Have any backup or emergency wells been placed into service? Answer C. Source – Surface Water (if surface water is not used check here 🔀 and go to subsection D) Yes No NA Is the intake screened and in good condition? П Any signs of vandalism or unauthorized access to source facilities? Does the raw water quality data indicate changes to the source water? Are there any obvious sources of contamination in the source? П Have there been any sewer or chemicals spills, or other disturbances in the area of the source? П Any signs of Algal blooms? Was there any heavy precipitation, rapid snowmelt or flooding recently? Any signs of drought or low water levels in the source? Has source water turnover occurred? D. Well House or other Low or High Service Pump House (if there are no well/pump houses, Answer check here and go to subsection E) Yes No NA П \boxtimes П Are there unsanitary conditions? \boxtimes Any openings where animals may enter? X Are there signs of animal activity?

3. Assessment Questions: Answer each question in Subsections A - H either Yes, No or Not Applicable (NA). Review and evaluate each question for potential causes of contamination. If the answer to any of these questions is unknown, leave blank and indicate on a separate

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| Are air/vacuum relief valves properly screened and air gapped? | X X | | | |
|--|---|---|--------------|--|
| Are any vents/reliefs associated with control valves air gapped and not subject to flooding? | | | | |
| Any cross-connections (piping in drains, chemical feed, Irrigation, fire suppression)? | | \boxtimes | | |
| Is the pump-to-waste piping capped and air gapped? | \boxtimes | | | |
| Is the well/pump house subject to flooding? | | \boxtimes | | |
| Is the well/pump house used for any other purposes such as storage or maintenance activities? | | \boxtimes | | |
| Is there evidence of unauthorized entry? | | \boxtimes | | |
| | | | | |
| E. Treatment (if no treatment check here and go to subsection F) | | Answer | | |
| | Yes | No 52 | NA | |
| Have there been additions or modifications to any treatment process? | | | _ | |
| Have there been interruptions in any chemical feed, treatment unit or process? | | | | |
| Have there been any recent maintenance or repair of treatment equipment? | | | | |
| Are all treatment devices and processes operational and properly maintained? | | | 井 | |
| Any signs of vandalism or unauthorized access to treatment equipment or facilities? | | | | |
| Are there any signs that the chemicals being fed have been contaminated (discoloration, unusual odors, suspended particles, etc.)? | | | | |
| If chlorine is used, was there a detectable residual at the sample sites where the positive samples occurred? | | | | |
| If chlorine is used, is a residual currently being detected at the plant tap and within the distribution system? | \boxtimes | | | |
| Were there any instances where C*T was not properly maintained? | | | \boxtimes | |
| Does water quality data indicate inadequate or inappropriate treatment of water? | | \boxtimes | | |
| if sand/gravel or other mixed media filtration is used, are the media depths near the original design depths and are the underdrains in good condition? | | | \boxtimes | |
| Did the plant flow exceed the state rated treatment capacity? | | | | |
| 2.0 | ПП | | | |
| For surface water plants, did a review of the turbidity data reveal any anomalies? | | 1 | | |
| For membrane plants, is daily integrity testing being performed every 24 hours of operation and do the | | | | |
| | | | | |
| For membrane plants, is daily integrity testing being performed every 24 hours of operation and do the results indicate that the membranes are in good condition? | | Answer | | |
| For membrane plants, is daily integrity testing being performed every 24 hours of operation and do the | Yes | Answer No | | |
| For membrane plants, is daily integrity testing being performed every 24 hours of operation and do the results indicate that the membranes are in good condition? | Yes | Answer No | | |
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| Is there any evidence the system experienced low (< 20 psi) or negative pressure? | | \boxtimes | | | |
|--|-----------------|-------------|-------------|--|--|
| Have there been any water main breaks, repairs, or new main installations? | | \boxtimes | | | |
| Have there been any firefighting, system flushing or other high demand events recently? | | \boxtimes | | | |
| Have there been any distribution system booster pump issues, repairs or new installations? | | | \boxtimes | | |
| Have there been other construction activities like hydrant or valve replacement that could have introduced contamination into the system? | | \boxtimes | | | |
| Are there hydrants or blow-offs with unplugged weep/drain holes located in areas of high water table or poorly draining soils? | | \boxtimes | | | |
| Are there any dead-ends that are not flushed on a regular basis? | | \boxtimes | | | |
| Are there any air relief valves located in vaults where the vent terminates below grade or are not properly air gapped above grade? | | \boxtimes | | | |
| is the supply actively performing cross connection control inspections, including regular testing of all testable backflow preventers including those at residential accounts? | \boxtimes | | | | |
| Is there any evidence of intentional contamination in the distribution system? | | \boxtimes | | | |
| Are there any control or attitude valves subject to flooding? | | | \boxtimes | | |
| | | | | | |
| H. Operation and Maintenance (O & M) | | Answer | | | |
| n. Operation and Maintenance (O & m) | Yes | No | NA_ | | |
| | | | | | |
| Any changes in procedures or staff effecting O & M activities? | Street in terms | <u> </u> | | | |
| Any changes in procedures or staff effecting O & M activities? Is maintenance of all facilities and equipment being performed per appropriate schedule? | | | | | |
| | | | | | |

4. Issue Description: For any answer in Part 3 that is in a shaded box, use this space to describe the event and provide additional information on potential causes of contamination identified during the assessment. Include corresponding dates with your findings. Attach additional pages if needed. Include dates of sample collection, water main breaks, maintenance activities, etc. with your findings.

Any complaints from customers related to water quality or low pressure?

Have there been any illnesses reported or suspected of being waterborne?

Any other issues that could have contributed to bacteriological contamination?

On July 28, 2017 DEQ staff Wood Chool conducted a water system visit at the City of Belding. One of the items found was that the phosphate day tank at the well houses has cap removed to provide an opening for the phosphate injection tubing. The opening could allow insects or dirt/dust to get inside the phosphate day tank and contaminate the phosphate solution. Of the four wells serving the water system, Well 4 phosphate tank is the one of concern and it has black substance settled at the tank bottom. Water operator was requested to replace Well 4 phosphate tank with new phosphate solution. It was our understanding that Well 4 phosphate solution was replaced before the incident happened.

It is our understanding that there are no interruptions in chlorine treatment when the incident occurred. If the phosphate solution is compromised the chlorine treatment will provide the disinfection of the phosphate solution added to the water system. We do not think that the phosphate solution is the cause of the positive bacteriological test results.

Our inspection on August 7, 2017, all the phosphate day tanks were adequately sealed with no openings for potential contaminants to get inside the tank.

Also, the August 7, 2017 inspection we find that the Well 4 screened casing vent discharge pipe outlet was very close to floor drain. Appropriate air gap must be provided between the discharge pipe outlet and the floor drain. The lack of adequate air gap may cause a potential cross connection if the discharge pipe outlet is submerged in unpotable water. During our inspection, the discharge pipe outlet was not submerged and cross connection was not an issue.

Another item found was the rusted condition of the well pump houses doors specifically at the door bottom and some of the wood were rotted. Some of the rotted wood created small holes where rodent could get inside the well pump house and if chlorine gas leak occurs it could get outside the well pump house. We do not think the rusted doors contribute to bacteriological samples tested positive.

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| 5. Corrective Actions Taken or to be Taken for any Issues Identifitaken and date completed; and/or a proposed timetable for corrective a | ed in Part 3: Use this space to describe corrective actions already actions not yet completed. Attach additional pages if needed. | |
|--|---|--|
| is clean. | ank routinely to ensure that the phosphate solution | |
| Provide adequate air gap for Well 4 casing vent discharge pipe outlet over the floor drain by | | |
| September 30, 2017. 3. The well pump rusted doors that has rotted replaced by October 31, 2017. | wood at the door bottom need to be repaired or | |
| | | |
| Certification: I hereby certify that the information contained herein information. Must be DEQ - ODWMA staff. | n is true, accurate and complete to the best of my knowledge and | |
| Assessor's Name (printed): Wood Chool and Jeremy Klei | n | |
| Assessor's Signature: | Date: 8.24.17 | |
| | | |
| 7. DEQ District Supervisor Review: This section is to be completed | d by DEQ District Supervisor. | |
| Supervisors Name: Luke Dehtiar | Date Reviewed: 8/29/17 | |
| Date Received: (22/7) | Within 30 days of trigger: Yes 🔼 No 🗌 | |
| Assessment Complete: Yes No | Likely Reason for Positive Samples Identified: | |
| Corrective Actions Completed: | Proposed Schedule Acceptable: | |
| Yes No NA | Yes No NA NA | |
| Assessment Level Reset: Yes No X | | |
| Comments: | | |
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