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GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GRETHOR  
DIRECTOR

TO: Upper Peninsula Water Well Drilling Contractors  
Upper Peninsula Local Health Departments:  
Attn: Environmental Health Directors  
Water Supply Sanitarians

FROM: James (Matt) Gamble, Supervisor  
Source Water Unit  
Environmental Health Section  
Office of Drinking Water and Municipal Assistance

DATE: January 23, 2017

SUBJECT: Advisory on Use of Uncertified 8 inch Steel Water Well Pipe

Implementation of R 325.1640 (Rule 140) of the Michigan Water Well Construction and Pump Installation Code (Well Code), adopted under Part 127, Water Supply and Sewer Systems, of the Public Health Code, 1978 PA 368, as amended, has resulted in regulatory and industry concerns. Currently, there is no 8 inch steel pipe that meets Rule 140 requirements available.

Rule 140 of the Well Code requires that certain water well components, such as coatings on steel pipe, be in compliance or surpass the American National Standard/National Sanitation Foundation International (ANSI/NSF) Standard 61 - Drinking Water System Components - Health Effects (Standard 61). Standard 61 establishes standards for the chemical contaminants and impurities that are indirectly imparted to drinking water from products, components, and materials used in drinking water systems. With public health in mind, the adoption of Standard 61 into Rule 140 was deemed appropriate and reasonable.

In 2000, Department of Environmental Quality (DEQ) inquiries had indicated IPSCO Tubulars, Inc. manufactured up to 8 inch black carbon steel pipe with Standard 61 certification. Since that time, steel pipe manufacture became heavily reliant on increased demand from the oil and gas production industry. The recent downturn in energy prices has resulted in foreign and domestic steel plant closures. Also, the marketing advantage of certification may not outweigh the cost of certification with a relatively small market for 8 inch steel water well pipe. As a result, no firms remain that produce 8 inch black carbon or galvanized pipe that complies with Rule 140.

While Standard 61 is a widely recognized protocol for assessing health risks from drinking water components and materials, a regulatory dilemma has arisen since certified 8 inch steel pipe is no longer available. Consequently, the DEQ is issuing this advisory to provide a temporary reprieve from having to use Standard 61 certified 8 inch steel pipe until the product becomes available.

The 8 inch steel pipe must continue to meet all other requirements and standards as specified in the Well Code. This temporary exemption does not apply to plastic well casing.

In August 2000, Mike Gaber (former Well Construction Unit Chief) issued a memorandum to water well industry stakeholders regarding an enforcement exemption due to the lack of steel well casing that complied with the provisions of Rule 140. This exemption continues to remain in place for steel well casing 8 inches or greater until certified products become available.

If you have any questions, please contact at 517-897-1508; [gamblej1@michigan.gov](mailto:gamblej1@michigan.gov); or DEQ, Office of Drinking Water and Municipal Assistance, P.O. Box 30241, Lansing, Michigan 48909-7741.

cc: Michigan Ground Water Association  
Director's Water Well Advisory Committee  
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