



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



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TO: Community Public Water Supply Owner or Operator

FROM: Eric J. Oswald, Director   
Drinking Water and Municipal Assistance Division

DATE: April 19, 2019

SUBJECT: Preliminary Distribution System Materials Inventory

This letter is written to provide guidance for the development of a Preliminary Distribution System Materials Inventory (DSMI), required by the lead and copper provisions of the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399). Pursuant to Rule 325.11604(c)(i) of Act 399, a Preliminary DSMI is due to be submitted to the Michigan Department of Environmental Quality (MDEQ) by January 1, 2020.

The purpose of the Preliminary DSMI is to summarize what is currently known about your distribution system and the types of records that support this characterization, with an emphasis on service line materials. The Preliminary DSMI will also help direct record-keeping and inventory activities that must occur prior to submittal of your Complete DSMI, due January 1, 2025. These activities should include the establishment or continuation of a comprehensive record management system that is updated regularly as new inventory is added or confirmed.

The Preliminary DSMI form is located at: [www.michigan.gov/deqleadcopper](http://www.michigan.gov/deqleadcopper). The initial question on the form allows supplies that do not have service lines or risers to indicate this and skip most of the remaining questions while still certifying and returning the form. This may apply to supplies with no distribution systems such as small supplies serving a single building or water authorities without their own service lines. Manufactured housing communities must fill out the entire form. The remainder of the form consists of a table to be filled with numbers of service lines that fit into specific categories, along with some follow-up questions.

Potential sources of service line information include, but are not limited to, the following:

- Municipal codes;
- Construction specifications;
- Plumbing codes;
- Plumbing permits;
- Distribution maps and drawings;
- Inspection and maintenance records;
- Meter installation records;
- Billing records;
- Water asset databases;
- Geographic Information System;
- Standard operating procedures;
- Operation and maintenance manuals;
- Permit files;
- As-Built drawings;
- Existing water quality data;
- Property tax records;
- Interviews with senior personnel, building inspectors, and retirees;
- Community survey;
- Policy documents; and
- Other

It is recognized that there may be service lines of unknown material at this time, and there are categories available in the table for this purpose. In general, it is better to count service lines in the unknown categories at this point rather than assuming certainty, as the Preliminary DSMI is

intended to be a snapshot of your current understanding of the inventory. Additional investigation should be done to lower the number of services lines in the unknown categories before submittal of the Complete DSMI.

In addition to service line materials, all other distribution system materials must also be recorded. These materials are often identified in other required documents such as general plans, reliability studies, issued permits, and/or asset management plans. If you feel as though these records do not fully characterize your distribution system as required, then contact your district engineer to discuss.

#### Goals of the Preliminary DSMI:

1. Compile and review all available records for identifying service line materials in the distribution system.
2. Summarize the service line inventory by material with the primary goal of identifying the number of known lead service lines, galvanized service lines previously connected to lead, and service lines of unknown material.
3. Characterize completeness and accuracy of existing service line inventory.
4. Identify information gaps requiring additional verification efforts when preparing the complete inventory.
5. Support meaningful planning for service line materials verification and replacement efforts, if applicable.

You are done with the Preliminary DSMI when you complete the following:

1. Complete a thorough review of all available distribution system and service line records, as well as all other available and applicable data including local ordinances, codes, permits, etc.
2. Prepare a summary of the service line inventory including the number of known lead service lines and galvanized service lines previously connected to lead.
3. Describe the documentation used to support the data summary.
4. Describe your level of confidence in the records and data summary.
5. Certify your summary and submit to MDEQ by January 1, 2020, using the Preliminary DSMI Reporting Template provided by the MDEQ. Keep supporting documentation on file at your water supply.

#### **Complete DSMI due January 1, 2025**

There have been many questions about what will be specifically required to verify service line materials in the Complete DSMI, which is due to be submitted to the MDEQ by January 1, 2025. The Complete DSMI will require each water supply to maintain individual records for each service connection address within the distribution system. Required information will include material type for the portions of service line on both public and private property, along with the method for each determination (field verified, service card data, etc.). The Complete DSMI will also require more documentation of the methods used to verify service line material. An example template will be provided by the MDEQ for this purpose, but other tools may be used by water supplies if they contain the same information.

It is not the intent of the revised rules to require the entirety of each unidentified service line to be unearthed and visually inspected prior to submittal of the Complete DSMI. You may have varying degrees of confidence in service line material identification, ranging from complete certainty about lines that have been installed or inspected in recent years to a lack of full knowledge about some parts of the distribution system. There may be some service lines with limited available data such as very old service records or extrapolations based on service line material at nearby homes.

The degree of verification required will be based on the level of confidence in the materials identified in your inventory. Forthcoming guidance on the Complete DSMI will specify verification methods for service line categories of lesser confidence along with further recommendations. For now, the more work that can be done to fully categorize each service line within your distribution system, the better. Emphasis should be placed on identifying lead service lines so that water supplies can notify customers at those homes about their risk of lead in drinking water and plan to remove the lead service lines as currently required by Act 399.

If you have concerns about your supply's ability to replace an average of five percent of your lead service lines on an annual basis, you have the option of submitting a revised Asset Management Plan with an alternate schedule based on the specific needs of your community, pursuant to Rule 325.10604f(6)(b). That schedule will be evaluated by the MDEQ and approved if it demonstrates a solid commitment to prioritize the removal of lead service lines while taking into account the need to utilize limited resources to address other priority projects that also have the potential to impact public health.

Please look for further guidance on this topic at: [www.michigan.gov/deqleadcopper](http://www.michigan.gov/deqleadcopper) and contact your district engineer with questions specific to your supply.