MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

DRINKING WATER AND ENVIRONMENTAL HEALTH DIVISION

# MINIMUM SERVICE LINE MATERIAL VERIFICATION REQUIREMENTS FOR MANUFACTURED HOUSING COMMUNITIES

## INTRODUCTION

The 2018 lead and copper revisions to the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, require that water supplies develop and maintain a Complete Distribution System Materials Inventory (CDSMI). The purpose of the CDSMI is for water supplies to inventory the materials within the distribution system, including service line materials. The CDSMI was to be submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) by October 16, 2024, and there is a requirement to update the DSMI every five years after the initial submittal.

An important step in developing a CDSMI is the physical verification of a randomly selected, evenly distributed set of sites within a water system. Information gathered during the physical verification process helps to:

- **Develop an accurate and comprehensive inventory of distribution system materials.**
- **Effectively evaluate the accuracy of service line records and/or identify areas where records may be unreliable and where additional verification may be warranted; and**
- **Predict service line materials at locations within the water system that have not been physically verified.**

It should be noted that the physical verification process does NOT provide identification of every service line material within the water system, but rather a representative subset of sites within the Manufactured Housing Community (MHC). Physical verification of this subset of sites will help assess the accuracy of existing records and confirm the types of materials present within the system. This document should help MHC water supplies conduct the verification process in order to complete their CDSMI.

**Refer to the checklist in Appendix A for a summary of the verification steps described below.**

## VERIFICATION EXCEPTIONS

An MHC may avoid the verification steps below for some or all of its service lines/risers if adequate, documented controls (defined and described on the next page) were in place at the time of installation.

**Note:** For the purposes of this inventory, MHC connections to units, commonly known as risers, are considered service lines.

## MATERIAL VERIFICATION PROCESS STEPS

### Step 1: Randomly select service lines/risers for physical verification.

MHCs classified as community water supplies must physically verify at least 20 percent of service lines/risers in the distribution system. If an MHC was built in multiple construction phases, 20 percent

of the sites in each construction phase must be physically verified. Sites used for verification should be selected at random within each construction phase.

For example, if an MHC has a section built in 1970 and a section built in 1990, both construction phases should have 20 percent of the service lines randomly selected for physical verification.

If, at the time the service lines/risers were installed, controls were in place which specified materials used in service line/riser construction and the water supply has not observed deviations from these controls during operations and maintenance, then the verification steps below can be avoided. To avoid the verification steps below, the MHC must have documentation to support that controls were in place and may be asked by EGLE to provide this documentation.

> **Note:** A control, for the purposes of this document, is defined as: A general set of approved specifications or construction documentation that explicitly demonstrates the material usage in all service lines/risers. A control and/or adequate documentation could be plumbing inspection records, construction plans, invoices, etc.

**Step 2: Create a tool for tracking records and materials during verification.**

Create a spreadsheet, chart, or other tracking tool to record information that will be found during the physical verification of the sites selected in Step 1. An example spreadsheet is included at the end of this document.

Information to record should include, but is not limited to, the lot number/address, the material of the service line/riser, the date physical verification occurred, the method of physical verification, and any other comments or notes that may provide valuable information.

**Step 3: Conduct physical verification.**

Physical verification will require an inspection of the service line/riser for each site selected in Step 1. The service line/riser is the pipe connecting the water main (water supply side) to the exterior plumbing of the manufactured home (resident side). Physical verification should be conducted by removing skirting as necessary from the home to gain access to the service line/riser and visually verifying the material of the service line/riser.

> **Note:** If the materials entering and/or leaving the riser are not visible or able to be determined, then some excavation may be necessary to provide access for the visual inspection.

Record the material in the tracking tool. Include the actual material observed (such as lead, copper, galvanized, plastic), even if the material is as expected. If the service line/riser consists of different materials before and after the valve, note all materials found. To help identify the material of the service line/riser, a visual scratch test may be conducted (see EGLE's website: LSLR-Collaborative.org/Identifying-Service-Line-Material.html).

**Step 4: Evaluate results of physical verification.**

After physical verification has been completed and the information has been entered in the tracking tool, the information should be evaluated to determine the consistency of what was observed verses what was expected to be observed. Was everything observed that was anticipated? Did it match existing documentation? This evaluation will help determine if additional sites need to be physically verified.

The information gathered during the physical verification should be checked against existing records. This could be the General Plan, any controls in place at the time of construction, operation and maintenance records, and other relevant documentation. Most of this documentation should have been gathered during the Preliminary Distribution System Materials Inventory (PDSMI) process.

Compare the verification results with your existing records. If the physical verification does not match the expected findings, additional sites may need to be physically verified until a high confidence is reached to make a sound assessment of the service line/riser material of the remaining sites within the MHC. If this is the case, contact EGLE to discuss further and determine if physical verification of additional sites will need to be conducted.

**Step 5: Retain Verification Records.**

Documentation used throughout the verification and evaluation processes (controls, maintenance records, photographs, etc.) must be retained. You may be asked by EGLE to produce or submit these records.

## LEAD NOTIFICATION REMINDER

If you think you have identified lead or galvanized previously connected to lead, please contact EGLE to discuss the next steps. Next steps will include, but are not limited to, notification to residents within thirty days.

## BEYOND THIS VERIFICATION

By October 16, 2024, water supplies were to have submitted a CDSMI to EGLE. The form and manner of submittal was communicated by EGLE and can be found on the EGLE Lead and Copper Rule website. Additionally, there is a requirement to update the DSMI every five years after the initial submittal in 2024.

**EXAMPLE FIELD VERIFICATION TRACKING SPREADSHEET**

Supply Name: _____ WSSN: _____

| Lot Number/Address | Material(s) of Service Line/Riser* | Date Verified | Method of Verification | Comments |
|---|---|---|---|---|
| Lot 26 | Copper | 5/14/2022 | Visual | Add Comments |
| Lot 53 | Copper/Plastic | 5/20/2022 | Visual | Add Comments |

* Material of Service Line/Riser:

L = Lead C = Copper

G = Galvanized P = Plastic

O = Other (specify)

**Note:** If more than one material was observed for a service line/riser during physical verification, list all materials that were observed.

# Appendix A:
# Checklist for Conducting Physical Verification at Manufactured Housing Communities

This is a checklist to help Manufactured Housing Community (MHC) water systems complete the physical verification requirements of the Complete Distribution System Materials Inventory (CDSMI). Please see the full document for a more detailed description of each step in the process.

**Note:** For the purposes of this inventory, MHC connections to units, commonly known as risers, are considered service lines.

## PRE-STEP/VERIFICATION EXCEPTIONS.

Does the water system have controls in place that, at the time the service lines/risers were installed, specified materials used in service line/riser construction, and the water supply has not observed deviations from these controls[1] during operations and maintenance?

- ☐ **Yes, for the entire system.** If the MHC has complete, accurate, and legible plans specifying the service line/riser materials, they may be used instead of the physical verification process and the following steps do not need to be completed. Contact EGLE for more information on this option.
- ☐ **Yes, for a portion of the system.** The water system must complete the following steps for physical verification of the portion of the system without controls[1].
- ☐ **No,** the water system must complete the following steps for physical verification.

## STEP 1: RANDOMLY SELECT SERVICE LINES/RISERS FOR PHYSICAL VERIFICATION.

- ☐ Determine how many construction phases are within the MHC.
- ☐ Randomly select at least 20 percent of the service lines/risers from each construction phase.

For example, if there are 100 service connections, randomly select 20 of them. These sites will be physically verified.

## STEP 2: CREATE A TOOL FOR TRACKING RECORDS AND MATERIALS DURING VERIFICATION.

- ☐ Create a spreadsheet, chart, or other tracking tool to record the information found through physical verification. This should include columns to record the following information during Step 3 (list continues next page):

- **The lot number/address**
- **The material of the service line/riser**
- **The date physical verification occurred**

[1] A control, for the purposes of this guidance, is defined as: A general set of approved specifications or construction documentation that explicitly demonstrates the material usage in all service lines/risers. A control and/or adequate documentation could be plumbing inspection records, construction plans, invoices, etc.

- **Method of physical verification**
- **Any other comments or notes that may provide valuable information**

☐ Create a row in the tracking tool for each service line/riser selected in Step 1.

## STEP 3: CONDUCT PHYSICAL VERIFICATION.

☐ For each site selected in Step 1, remove the skirting as necessary to access the service line/riser under the home and visually inspect it to verify its material. Check the valve on the service line/riser and determine what material is used before and after the valve.

- **If the materials entering and/or leaving the riser are not visible or able to be determined, some excavation may be necessary.**

☐ Identify the material(s) of the service line/riser (such as lead, copper, galvanized, plastic, etc.).

☐ In the tracking tool, write what service line/riser material was observed for each site. If the service line/riser consists of different materials before and after the valve, note all materials found.

☐ If you think that you have identified any lead or galvanized previously connected to lead, please contact EGLE to discuss the next steps.

## STEP 4: EVALUATE RESULTS OF PHYSICAL VERIFICATION.

☐ Compare the results of verification with your existing records (such as the General Plan, controls, operation and maintenance records, etc.).

☐ If the results are not what you expected, contact EGLE to discuss if additional verification will be needed.

## STEP 5: RETAIN VERIFICATION RECORDS.

☐ Save any documentation used (such as controls, maintenance records, site inspection sheets, photographs, etc.).

## BEYOND THIS VERIFICATION

The deadline for submitting the initial CDSMI to EGLE was October 16, 2024. An updated DSMI will be required to be submitted to EGLE every five years after the initial CDSMI submission.