



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



LIESL EICHLER CLARK
DIRECTOR

TO: Community Water Supply Owners or Operators

FROM: Drinking Water and Municipal Assistance Division (DWMAD)

DATE: March 20, 2019

SUBJECT: Lead and Copper Sample Site Selection Criteria Revisions
Lead and Copper Sampling Plans Due by January 1, 2020

Since initial promulgation in the 1990s, both federal and Michigan lead and copper regulations have required water supplies to select sites for lead and copper sampling using risk-based tiering criteria and to maintain a pool of identified sites to meet lead and copper sampling requirements. This memo is to remind you of this ongoing requirement, as well as the changes to the Michigan requirements that directly impact your water supply.

Recently enacted changes to the lead and copper provisions of the administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, revised the above referenced items in the following way:

- Sample site selection tiering criteria have been modified to further emphasize the presence of lead service lines and lead interior plumbing.
- Sampling pools must now be submitted to the Michigan Department of Environmental Quality (MDEQ).

All community water supplies must review their sampling pools, compare their existing sampling sites to the revised site selection criteria, update sampling sites if necessary, and submit a sampling plan to the MDEQ **by January 1, 2020**. Please follow the steps on the next page to meet these requirements. If you oversee more than one supply, you must submit an individual sampling plan for **EACH** supply.

If your water supply is scheduled to conduct lead and copper sampling during 2019, focus first on verifying the sites you will be sampling this year, then the sites needed to conduct expanded sampling or alternate sites.

If you have questions about completing this form, please contact either Ms. Jeni Bolt, Environmental Quality Specialist, Technical Support Unit, Community Water Supply Section, DWMAD, at 517-331-5161 or boltj@michigan.gov; or Ms. Heather Jackson, Environmental Quality Analyst, Technical Support Unit, Community Water Supply Section, DWMAD, at 517-242-3997 or jacksonh@michigan.gov.

Steps to Completing and Submitting a Lead and Copper Sampling Plan

- Review the revised sample site selection criteria** (enclosed).
- Review your existing sampling pool** to determine if the sites continue to meet the revised tiering criteria.
- Retain sampling sites that continue to meet revised criteria.** If some or all of your water supply's lead and copper sampling sites are still highest risk based on the revised tiering criteria, then those sites should remain in your sampling pool.
- Identify new sites as necessary.** If any sites no longer meet highest risk tiering criteria, those sites should be replaced. In other words, lower risk sites should be replaced by higher risk sites.
- Identify AT LEAST enough sites to conduct STANDARD monitoring,** though it is highly recommended you identify at least 1.5 times the standard number of sites needed. Even if your water supply is currently qualified for reduced sampling, an action level exceedance or other circumstance could lead to standard monitoring on short notice. Therefore, it is important to have enough sites identified in advance. Additionally, a routine site may not be available/accessible or no longer meet tiering criteria, making it important to have additional sites identified in advance. The number of sites required for standard monitoring can be found with the instructions accompanying the reporting form identified in the next step.
- Complete Michigan Department of Environmental Quality (MDEQ) form number EQP6785 entitled "Sampling Plan – Lead and Copper."** Go to www.michigan.gov/deqleadcopper to download the form.
- Submit the completed form to the MDEQ no later than January 1, 2020.** Mail or email your completed, signed form to the appropriate district office.
- Maintain your sampling plan.** Going forward, remember to review your sites before each sampling event. Rules require that the **same** sites be sampled during each sampling event, provided the sites still meet risk-based criteria. If you determine a site no longer meets the criteria or is no longer available, your sampling plan should be revised and resubmitted.

The following are examples of when a site must be removed from the sampling pool and replaced by a higher risk site (this list is not all-inclusive):

- The lead service line has been replaced and the site is no longer Tier 1. The site must be removed and replaced by another Tier 1 site.
- A water supply's highest tier locations are Tier 3 sites (copper with lead solder installed before 1988). A site meeting Tier 3 criteria has replaced interior plumbing with plastic. This site must be removed and replaced by another site meeting the Tier 3 criteria.
- A site has installed a home treatment system designed to remove inorganic contaminants. Unless the treatment system can be bypassed or removed, this site no longer meets site criteria and must be replaced.

Michigan Lead and Copper Rules

Lead and Copper Sample Site Selection Criteria

(updated to include June 2018 rule revisions)

Community water supplies must identify a pool of lead and copper sampling sites containing **AT LEAST** the number of sites necessary to conduct **STANDARD** sampling. The sampling pool must target high risk sites using the criteria below. For specific rule language, see R325.10710a(1) of the administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended.

- **Samples must be collected from Tier 1 sites unless ...**
- insufficient Tier 1 sampling sites are available, then **Tier 2** sites must be used unless ...
- insufficient Tier 1 and Tier 2 sampling sites are available, then **Tier 3** sites must be used.
- If no Tier 1, 2, or 3 sites are available, sampling sites must be representative of plumbing materials typically found throughout the water system.

TIER 1 SITES - Single family residences with either:

- Lead service lines (LSL)*
- Interior lead plumbing

Multiple family residences (MFR) with LSLs or interior lead plumbing may be used as Tier 1 sites when MFR comprise at least 20 percent of the total service connections.

TIER 2 SITES – Other buildings or MFR with either:

- LSL*
- Interior lead plumbing

TIER 3 SITES - Single family residences with:

- Copper plumbing with lead solder installed before July 1988

OTHER SITES

- Sites representative of plumbing materials commonly found throughout the water supply

*** Priority should be placed on sites with full LSLs, followed by partial LSLs, followed by lead goosenecks or pigtails.**

Also Note:

- Each round of sampling should be conducted at the **SAME** sampling sites unless ...
 - a site no longer meets tiering criteria (for example, a site is no longer Tier 1 after having the LSL replaced); or
 - a site is unavailable (for example, a site has no water service, resident refuses to participate, etc.).
- **DO NOT** sample from outside hose spigots or utility sinks.
 - For residential sites, samples **MUST BE** collected from kitchen or bathroom taps typically used for consumption. For non-residential sites, samples **MUST BE** collected from taps typically used for consumption.
- Samples **MAY NOT** be taken from taps that have point of use or point of entry treatment devices designed to remove inorganic contaminants, such as an iron removal filter, reverse osmosis system, or water softener.