



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
DRINKING WATER AND ENVIRONMENTAL HEALTH DIVISION

**COMPLETE DISTRIBUTION SYSTEM MATERIALS INVENTORY (CDSMI)
SUBMISSION INFORMATION**

Requirements:

2018 revisions to the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, requires that water supplies develop and maintain a CDSMI. Pursuant to Rule 325.11604(c)(ii), the CDSMI must be submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Federal rule 40 CFR § Part 141.84(a) also requires submission of an inventory by October 16, 2024. To meet both state and federal requirements, **the CDSMI must be submitted to EGLE by October 16, 2024.**

Purpose:

The purpose of the CDSMI is to characterize, record, and maintain a comprehensive inventory of distribution system materials, including service line materials on both system-owned and customer-owned portions. Maintaining an accurate inventory of distribution materials supports effective asset management planning, lead service line replacement efforts, and notification of those served by a lead service line.

Goals of the CDSMI:

1. Characterize and document distribution system materials, including service line materials on both system-owned and customer-owned portions.
2. Summarize physical verification efforts to improve inventory accuracy (the scope of field verification will vary based on the number of unknown service lines and the reliability of records).
3. Develop and maintain effective data management systems and data maintenance procedures.
4. Inform residents served by a lead, galvanized requiring replacement, and lead status unknown service lines within 30 days of material determination.
5. Support ongoing asset management and service line replacement efforts.

Completing the Requirements:

The CDSMI must include the classification for both the system-owned and customer-owned portions for each service line in the distribution system. After completing the minimum service line materials verification requirements, supplies should have followed the “Evaluating Minimum Service Line Materials” guidance to help evaluate the reliability of records, determine if additional verifications were needed, and complete the classification of unknown service lines in the distribution system. The classification of service lines can be based upon physical verifications, records, ordinances, controls, or assumptions. Where a customer has refused access, communities may use “access denied” as the classification, if properly documented according to Administrative Rule 325.11604(c).

In addition to service line material classification, communities must identify construction materials in the piping, storage structure, pumps, and controls used to deliver water to the public. Although in most cases water supplies will have this requirement met with their existing general plan, reliability

study, or assessment management plan, water supplies should confirm those items are updated and a copy on file with the appropriate EGLE district office.

WHAT NEEDS TO BE SUBMITTED:

All documentation and records utilized during the DSMI process shall be retained and available for EGLE review upon request. The following documents must be submitted to EGLE:

- **CDSMI Summary**

EGLE requires the completion of the CDSMI Summary form as part of the final CDSMI submittal. There are two forms available at Michigan.gov/LCR.

- [EQP5863](#) - Systems that have service lines defined as “the pipe from the discharge of the corporation fitting to customer site piping or to the building plumbing at the first shut-off valve inside the building, or 18 inches inside the building, whichever is shorter.” This includes risers for Manufactured Housing Communities.
- [EQP5864](#) - Systems that do not have service lines and the distribution system is limited in extent. This serves as the summary form and line-by-line inventory.

Supplies must complete the applicable form. When completed correctly, the form will provide updated information for the following:

- A summary count of service line material classifications in the distribution system.
- Minimum Service Line Material Verification (MSLMV) activities.
- Ongoing activities to identify/record service line material.
- General information about the system and a plan to incorporate environmental justice and sensitive populations into activities; and
- The accessibility of the service line materials inventory for your customers.

Although situations may remain where service line materials are unknown, EGLE expects communities to work to eliminate the number of unknown service lines as soon as possible.

- **Detailed Line-by-Line Inventory**

In addition to the form referenced above, EGLE requires a line-by-line inventory be submitted to the MiEHDWIS portal or to the appropriate EGLE district office by the October 16, 2024, deadline. EGLE has provided a [line-by-line inventory template](#) that water supplies can elect to use. **Note:** The line-by-line inventory is included in form [EQP5864](#) for water supplies with distributions systems limited in extent; a separate submission is not required.

EGLE requires a minimum of the following fields be provided on the line-by-line inventory:

- Physical address that specifies the location of the building and subsequent service line.
- Service line material classification for each portion of the service line.
- Verification method for determining material classification.
- Documentation of when access was denied.

Note: Access denied documentation should be kept in the system’s records and be available for EGLE review upon request. These documents should include the date of the denial, to whom the denial was communicated, and the denial itself in writing.

Public Accessibility Reminder:

In addition to these submittal requirements, all water supplies are required to have the inventories publicly accessible. CFR 141.84(a)(8) states, “The inventory must include a location identifier, such as a street address, block, intersection, or landmark, associated with each lead service line and

galvanized requiring replacement service line. Water systems may, but are not required to, include a locational identifier for lead status unknown service lines or list the exact address of each service line. Water systems serving greater than 50,000 persons must make the publicly accessible inventory available online.”

Reminder related to ongoing lead service line identification activities:

- Michigan water supplies have been required to provide notice to all owners and occupants of buildings served by a service line containing lead, or presumed to contain lead, within 30 days of determination. Where service line materials cannot be determined, owners and occupants must be notified of the potential for lead. Current federal regulations expand the notification requirements to include locations served by GPCL/GRR and lead status unknown service lines.
- Partial lead service line replacement (LSLR) is banned in the State of Michigan, except during an emergency repair, to prevent the risk of increased lead exposure. All required notifications, sampling, and reporting associated with the partial emergency repair of lead service line should be implemented by water supplies pursuant to R 325.10604f(5) and R 325.10604f(6).
- Annual LSLR should be maintained at an average rate of five percent (5%) per R 325.10604f(6), or seven percent (7%) per year per R 325.10604f(5).

Guidance for Submittal

EGLE requires both the completed summary form and a line-by-line inventory. Water systems are encouraged to submit Excel formatted files.

Submit your completed document and the attached line-by-line inventory to EGLE via your Michigan Environmental Health and Drinking Water Information System (MiEHDWIS) account, or via email to your EGLE district office email address no later than October 16, 2024.

If you need this information in an alternate format, contact EGLE-Accessibility@Michigan.gov or call 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations. Questions or concerns should be directed to the Nondiscrimination Compliance Coordinator at EGLE-NondiscriminationCC@Michigan.gov or 517-249-0906.

This form and its contents are subject to the Freedom of Information Act and may be released to the public.