

# Complete Distribution System Materials Inventory

## Overview

### Requirements

2018 revisions to the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, requires that water supplies develop and maintain a Complete Distribution System Materials Inventory (CDSMI). Pursuant to Rule 325.11604(c)(ii), a CDSMI must be submitted to the Michigan Department of Environment, Great Lakes, and Energy (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 public and private property. Maintenance of 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 public and private property.
2. Demonstrate through physical verification that the inventory is accurate (the scope of field verification will vary based on number of unknown service lines and reliability of records).
3. Demonstrate effective data management systems and data maintenance procedures are in place and consistently implemented. If you do not have a data management system or maintenance procedures, they should be developed.
4. Inform residents served by a lead service line.
5. Support ongoing asset management and service line replacement efforts.

## Developing Your CDSMI

### Organize and Review Existing Records

An early step in the CDSMI process should include a thorough review of existing records. A comprehensive review and organization of records will help identify what information is available and where gaps exist. Much of this should have been done when developing the Preliminary Distribution System Materials Inventory that was due to EGLE by January 1, 2020.

### Evaluate Existing and/or Create an Inventory Tracking System and Procedures

Water supplies must develop and maintain a system for tracking distribution system materials, including service line materials on both public and private property. Tracking systems can include advanced data systems, spreadsheets, GIS software, or other methods that are sufficient to maintain the inventory. Supplies should also create and/or review existing procedures that establish how the inventory will be maintained.

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## Conduct Physical Verification of Service Line Materials

Most water supplies must conduct some physical verification of service lines materials in their distribution system. The extent of minimum physical verification efforts will depend on water supply size and knowledge of service line materials.

## Evaluate Results of Physical Verification

After conducting the physical verification in the previous step, supplies should compare pre-verification records with the field-verified findings to assess reliability of existing records. If the verification confirms existing records are reliable, a water supply may feel confident moving forward with finalizing their CDSMI based on those records. However, supplies that find the reliability of records to be mixed or unreliable may need to conduct additional physical verification.

## Conduct Additional Verification of Service Line Materials or Other Distribution System Components, as/if Needed

As noted above, supplies that find existing records to be unreliable may need to conduct additional verifications. Next steps will be supply-specific. For example, a supply finding some types of records to be reliable while others are not may require additional verification targeted to problem areas. Those with broadly unreliable records may require significant additional work.

## Update and/or Expand Records to Develop the CDSMI

Supplies should use the information gained above to build-out their CDSMI. Some supplies may wish to use techniques such as predictive modeling to assist with this effort. Supplies may need assistance if using such methods.

## Report to EGLE

By **October 16, 2024**, supplies must submit a CDSMI to EGLE. The form and manner of submittal will be communicated by EGLE in separate guidance.

## Maintain Your Inventory and Submit Five-Year Updates

CDSMIs should be maintained on an ongoing basis. An updated inventory must be submitted to EGLE every five years.

### **\*\*Remember to Notify the Public\*\***

Owners and occupants of buildings served by a service line containing lead or presumed to contain lead must be notified within 30 days of determination. Owners and occupants of buildings where service line materials cannot be determined must be notified of the potential for lead.

For more information, visit [Michigan.gov/LCR](https://Michigan.gov/LCR).

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