

Rule Summary

Lead and Copper Rule Revision Summary

Below is a summary of recent lead and copper regulatory changes in Michigan. Please note that this summary is not comprehensive. Lead and copper requirements are complex, and additional information and training is being developed to help water supplies comply with the new requirements.

Lead Action Level

- The lead action level of 15 parts per billion (ppb) remains in effect through December 31, 2024. The new lead action level of 12 ppb will take effect January 1, 2025.
- Lead and copper 90th percentiles are now calculated using highest lead and highest copper results from each site.

Lead and Copper Tap Sampling

- Lead and copper tap sampling pools must be reviewed, updated as necessary, and submitted to the Michigan Department of Environmental Quality (MDEQ) by January 1, 2020.
- Tier 1 and Tier 2 sample site criteria no longer include sites with copper pipes soldered with lead and installed after 1982. Tier 3 criteria have been modified to include sites with copper pipes soldered with lead and installed before July 1988.
- Systematic flushing of a sampling site and/or aerator removal or cleaning is prohibited immediately before compliance sampling is conducted.
- A second sample, in addition to the first draw, will be required at sites served by a lead service line (details and instructions will be provided once developed). The highest lead result and the highest copper result will be used to calculate the 90th percentile.
- A supply with optimal corrosion control treatment (OCCT) cannot reduce to three year lead and copper tap monitoring unless it meets water quality parameter ranges and either of the following apply:
 - The water supply has no lead service lines OR
 - The water supply has three annual rounds of sampling with 90th percentiles less than or equal to 5 ppb for lead and 650 ppb for copper.

Distribution System Materials Inventory (DSMI)

To ensure distribution system components and service lines are properly identified and effectively inventoried, the following requirements apply:

- A preliminary DSMI, based on available information, must be submitted to the MDEQ by January 1, 2020.
- A final DSMI must be submitted to the MDEQ by January 1, 2025, with a comprehensive updated inventory due every five years thereafter.
- Supplies with lead service lines must report to the MDEQ annually on the status of lead service line replacement efforts.
- Supplies must notify residents served by lead service lines within 30 days of determining the service line content.

Lead Service Line Replacement

The Lead and Copper Rule previously required replacement of lead service lines at a rate of 7 percent per year, only when a water supply continued to exceed the lead action level after installing corrosion control treatment. While this requirement remains in effect, lead service line replacement requirements have been expanded to include the following:

- Partial lead service line replacement is no longer allowed except in the case of an emergency repair.
- Water supplies with lead service lines, regardless of lead action level values, must replace all lead service lines at an average rate of 5 percent per year, not to exceed 20 years, or in accordance with an alternate schedule incorporated into an asset management plan and approved by the MDEQ.
- The full lead service line must be replaced at water supply expense, regardless of ownership.
- A new service line definition was added, and the lead service line definition was updated.

Water Quality Parameter (WQP) Sampling

- WQP sampling is required for all supplies with OCCT, including small and medium supplies, and all supplies exceeding an action level.
- WQPs have been expanded to include chloride and sulfate.
- WQP monitoring can no longer be reduced to 3-year monitoring.
- Rules have been clarified to require establishment of WQP ranges in the distribution system.

Continuity of Sources and Treatment

- Clarification that supplies purchasing water from a supply with OCCT must also maintain OCCT.
- Clarification that the MDEQ may require new or updated corrosion control studies when a supply changes source or treatment, or at any other time as appropriate.

Enhanced Transparency

- The consumer notice of results (the results information provided to residents of sampled sites) must now include copper.
- Additional content and delivery requirements for lead public education following a lead action level exceedance have been added.
- Additional Consumer Confidence Report content for lead and copper reporting and lead service line reporting have been added.
- A statewide advisory council will be created to assist with development of public awareness campaign materials.
- Supplies serving 50,000 people or more must establish a community advisory council to assist with development of public awareness campaign materials.