

Michigan Lead and Copper Rule Revisions

Molly Maciejewski, Public Works Manager, City of Ann Arbor

Michigan LCR: A Brief History

- ▶ July 27 - December 2017: Stakeholder Meetings
- ▶ November, 2017: Public Meeting
- ▶ January 29, 2018: Draft Rule Published
- ▶ March 1, 2018 Public Hearing
- ▶ March 21, 2018 Public Comment Deadline
- ▶ May, 2018 JCAR Review
- ▶ May, 2018 Revised Draft
- ▶ June 14, 2018 Rule Finalized and Filed with Michigan SOS

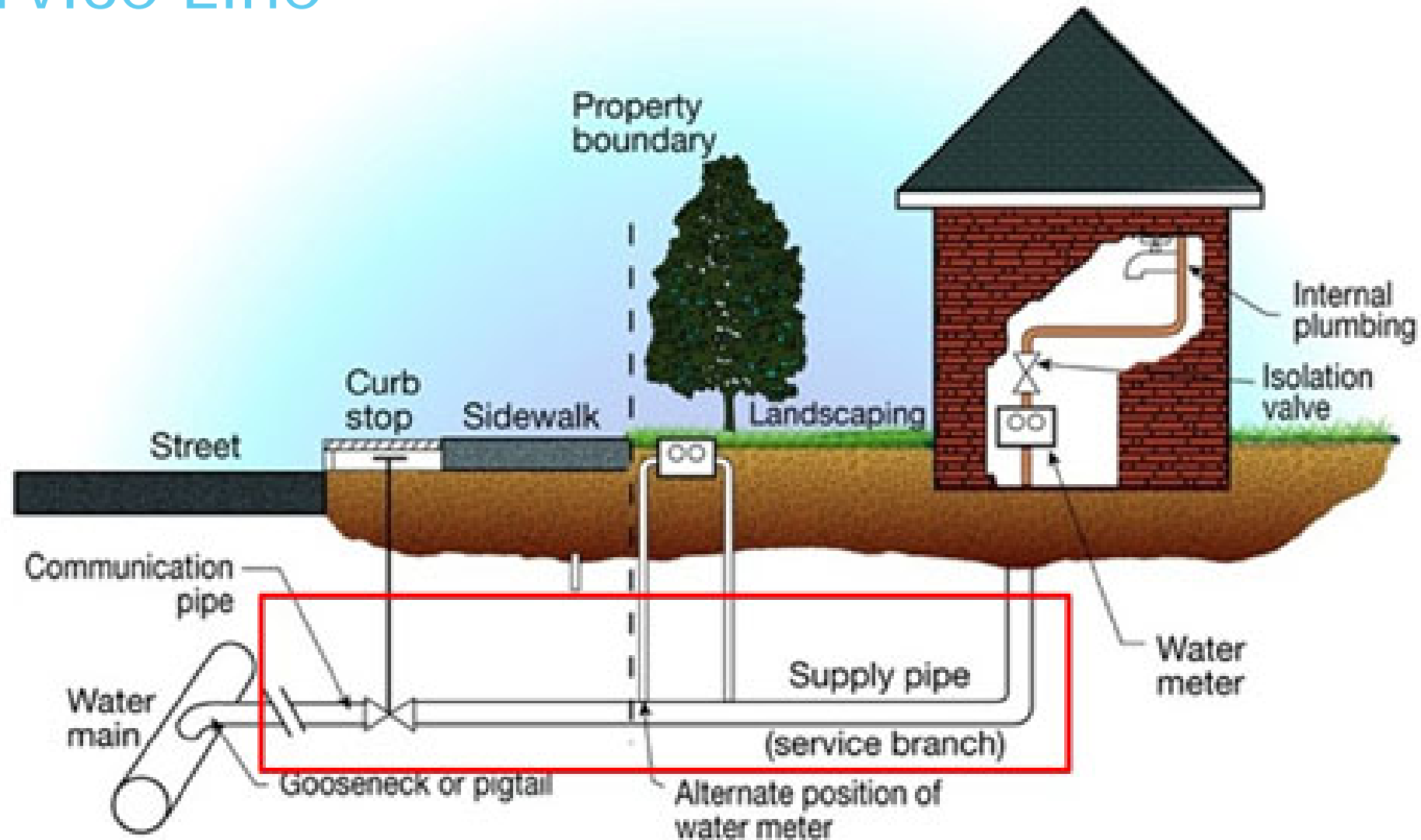


Applies to CWS and NTNCWS

Summary of Changes

Existing	Revised
Action Level 15ppb	Action Level 12 ppb
Defines Service Connection but not service line. Includes definition for lead service line	Added definition of Service Line and updated definition of Lead Service Line
Distribution system materials inventory maintained by water system, no updates, reporting or field verification required	Requires preliminary ("desktop") and field verified inventory. Includes public and privately owned portions of service line. Requires periodic reporting, notification and updates
Sampling Pool by Tiers	Revised requirements for sampling pool selection
One First Draw Sample per site	If LSL: Two Samples per site
90 th ile based on all samples	90 th ile based on highest results per site
LSLR only if exceed AL after installation of CCT	LSLR required @ 5%/year or as part of an approved Asset Management Program
LSLR: Responsibility limited to publicly owned portion of line	LSLR requirement includes public and privately owned portions of LSL
LSLR: does not include replacement of galvanized lines	Includes replacement of galvanized lines that are or were connected to LSL
WQP monitoring requirements	Requires additional parameters and triggers for monitoring
Public Notification and Communication Requirements	Threshold population change for web postings, establishes requirement for Water Advisory Council, revised public education language

Service Line



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Service Line Definition

“Service Line” means 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.

“Lead Service Line” means either a service line which is made of lead or any lead pigtail, lead gooseneck, or other lead fitting that is connected to the service line, or both

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Materials System Inventory



- ▶ Preliminary inventory based on existing information
- ▶ Field Verified Inventory
 - ▶ Must keep record of refusals
 - ▶ If unable to verify, must assume LSL
- ▶ Must notify customers within 30 days if served by LSL
- ▶ Requires periodic updates
- ▶ Requires submittal to state
- ▶ CCR requirements (new 2x year)

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Service Line Replacement

- ▶ LSLR required @ 5%/year minimum, unless alternate schedule as part of an Asset Management Program is approved.
- ▶ LSLR requirement includes public and privately owned portions of LSL
- ▶ Presumes that the utility controls the entire service line unless it can demonstrate in writing that it does not
- ▶ Must replace galvanized lines that **are or were** connected to LSL. NOTE: No Sunset!



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Sampling

- ▶ Sampling pools must be reviewed and/or updated based on current materials inventory, and submitted to the state by 1/1/2020
- ▶ Sample sites
 - ▶ Samples must be collected at sites with lead service lines or lead piping
 - ▶ If no lead service lines, collect from single family homes with copper piping and lead solder installed before July 1988
- ▶ For Systems with LSL: Two Samples per site
 - ▶ First Draw
 - ▶ 5th Liter
 - ▶ Minimum 6 hour Stagnation
 - ▶ No Pre-Flushing
 - ▶ Do not remove Aerator
 - ▶ Sample Collection by Resident or Water System
- ▶ 90th%ile based on highest result from each site



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Public Notification, Education and Communication

- ▶ Create Statewide Advisory Council to generate lead public awareness campaign
- ▶ Create Water Advisory Councils in large cities (> 50,000 population) to advise on distribution of educational materials in their community
- ▶ Public Education
 - ▶ Requires utilities serving more than 1,000 people rather than those serving more than 100,000 people to post information on their website
 - ▶ Adds requirements for communicating about the unpredictability of lead release, the limits of 1-time tests, the high lead content of some lead particulates, availability of certified filters and proper filter maintenance, and information about lead-free plumbing fixtures
 - ▶ Adds community centers and adult foster care facilities to “at-risk” facilities

Michigan LCR Revisions

Public Notification, Education and Communication

- ▶ Educational Material required with notice for full and partial replacement
 - ▶ Ways to reduce lead exposure
 - ▶ Potential for lead increase
- ▶ Advise and consult with the City on efforts to replace private lead service lines at locations where the owner declined service line replacement
- ▶ Assist in promoting transparency of all data and documents related to lead in drinking water within the water supply service area
- ▶ Collaborate with local community groups to ensure that residents have the opportunity to be involved in efforts to educate the community about lead in drinking water
- ▶ Coordinate with MDEQ or the statewide drinking water advisory council

Acronyms

Acronym	
AL	Action Level
AMP	Asset Management Plan
CCR	Consumer Confidence Report
CCT	Corrosion Control Treatment
CWS	Community Water System
LSL	Lead Service Line
LSLR	Lead Service Line Replacement
NTNCWS	Nontransient Noncommunity Water System
PN	Public Notification
ppb	Parts Per Billion
WQP	Water Quality Parameters