



REMINDER ON WATER SYSTEM REQUIREMENTS



UPCOMING WATER SYSTEM REQUIREMENTS

LEAD AND COPPER RULE (LCR) — EGLE

Distribution System Materials Inventory (DSMI)

As required by the amended lead and copper provisions of the Safe Drinking Water Act (SDWA), a *Preliminary* DSMI (PDSMI) is required to be submitted to EGLE by **January 1, 2020**. The PDSMI is intended to summarize information on the distribution system (including material and verification methodology), with an emphasis on service lines. EGLE recognizes that there may be service lines of unknown material for the PDSMI and has allowed for this designation in their submittal forms. The PDSMI provides the water supply the opportunity to determine how much information is necessary to be investigated before submitting the *Complete* DSMI (CDSMI) on **January 1, 2025**.

WAMP Update



Also, within 12 months of submitting the PDSMI, the water supply is required to update their Water Asset Management Plan (WAMP) criticality analysis, which includes a reprioritization of assets based on the presence of lead service lines.

The WAMP update can also propose an alternate schedule of replacing any **lead service lines (LSL)**, which are currently mandated at an average of 5% per year, not to exceed 20 years, beginning January 1, 2021. An asset management approach can provide more flexibility for addressing several concerns associated with assets (water main breaks, aging water mains, operational issues, coordinating with other projects, etc.).

RISK AND RESILIENCE ASSESSMENT — EPA

On October 23, 2018, America's Water Infrastructure Act (AWIA) was signed into law. The law requires community (drinking) water systems serving more than 3,300 people to conduct a risk and resilience assessment of the utility and within six months of risk and resilience assessment certification, develop or update the emergency response plan (ERP).

Population Served	Risk Assessment	Emergency Response Plan (ERP)*
≥ 100,000	March 31, 2020	September 30, 2020
50,000–99,999	December 31, 2020	June 30, 2021
3,301–49,999	June 30, 2021	December 30, 2021

EXISTING WATER SYSTEM REQUIREMENTS

WATER RELIABILITY STUDY & GENERAL PLAN

Are you due for an updated Water Reliability Study? Have you received a notice to update your Water System General Plan? Michigan's Safe Drinking Water Act (MI-SDWA) requires that all Type I water supplies update their Reliability Study every five years. EGLE usually includes this requirement in their Sanitary Survey review and requests an update. At that time, they also review if it is necessary to provide a General Plan update.

Questions & Information:

If you have any questions regarding any of these requirements, you can contact your HRC representative or Brad Shepler/Nicole Selais at 248-454-6300.

Resources:

- EGLE Lead & Copper and PDSMI Form: www.michigan.gov/deqleadcopper
- EPA Risk & Resiliency: <https://www.epa.gov/waterresilience>
- MI-SDWA Reliability Study & General Plan (pages 266–282)
https://dtmb.state.mi.us/ORRDocs/AdminCode/1928_2019-035EQ_AdminCode.pdf

