

Michigan's Lead and Copper Rule

Summary of Changes

This document is put together in good faith by a coalition of organizations whose members are directly affected by the recent Rule change. The intent is to offer a summary of the changes as currently understood. For a final and binding interpretation of any part of the Rule, questions must be directed to the Michigan Department of Environmental Quality.

Summary of LCR changes:

Previous version of Michigan's Lead and Copper Rule	New version of Michigan's Lead and Copper Rule	Page in Rules
Supplies not required to remove lead service lines unless Lead Action Level is exceeded after corrosion control treatment is installed.	1 year after materials inventory, service lines must be replaced at 5%/year avg, not to exceed 20 years, unless an alternate schedule in an asset management plan is approved by the department.	
	Lead service lines include services with lead "goosenecks" and galvanized lines that are or were connected to LSLs.	
	Specifically, does not allow for lining or coating of services to meet lead replacement requirements. Definition of "Service Line" is a direct connection from a distribution watermain to a living unit and is not designed to be an integral part of the network of distribution watermains.	
Definition of "Service Line" is a direct connection from a distribution watermain to a living unit and is not designed to be an integral part of the network of distribution watermains.	The new definition is specific in that it is defined as the pipe from the discharge of the corporation fitting to customer site piping or building plumbing at the first shut-off valve inside the building or 18 inches inside the building.	
	Presumes that the utility controls the entire service line unless it can demonstrate in writing that it does not.	
The previous rule does not include lead fittings or goosenecks or a definition of a lead service line	The definition of a "Lead Service Line" includes lead lines, or those containing a lead pigtail or lead gooseneck or any lead fitting that is connected to the service line or both.	
Partial lead service line replacements are allowed, leaving customer-side lead lines in place unless customer agrees to pay for their portion.	Supplies must offer to replace private portion of lead service line at supply expense.	
	If owner declines offer, no partial replacement is allowed, unless as part of an emergency repair.	
	Must provide follow-up testing within 72 hours after partial replacement.	

LCR Changes

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Lead Action Level is 15 parts per billion (ppb)	Lower Lead Action Level to 12 ppb beginning January 1, 2025.	
Supplies can reduce lead and copper rule sampling to every three years	Reduced monitoring is allowed under specific requirements. May be allowed if optimal corrosion control and 90th percentile lead level is below 5 ppb and copper below .65 ppm for three consecutive years.	
Supplies are responsible for communicating with customers about drinking water issues.	Create Statewide Advisory Council to generate lead public awareness campaign materials	
	Create Local Advisory Councils in larger cities (> 50,000 population) to advise on distribution of educational materials in their community	
	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	
	Requires utilities serving more than 1,000 people rather than those serving more than 100,000 people to post information on their website	
	Consumer notice of results must now include copper	
Water supplies were required to complete a distribution system materials evaluation. Many supplies still using their original distribution system materials evaluation. Original evaluations not required to be updated or submitted to the state	Require updated distribution system materials inventories: preliminary inventory due 1/1/2020, verified inventory due 1/1/2025	
	Require inventory be submitted to the state	
	Require annual update to state on status of LSL replacement.	
	Require customers be notified if served by a LSL	
	Make service line summary information available	
	Requires update of inventory every 5 years	
Original sampling pools were designated in 1990s and not required to be submitted to the state.	Sampling pools must be reviewed and/or updated based on current materials inventory, and submitted to the state by 1/1/2020	
	Emphasize sampling at sites with lead service lines, if present.	

LCR Changes

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All valid compliance samples used to calculate lead and copper 90 th percentile values	Only use highest result of valid compliance samples taken at a site to calculate lead and copper 90th percentile values	
Only first-draw samples after at least 6 hours stagnation time are used for compliance, potentially representing only water in the fixture and indoor plumbing.	Require second sample after 5 additional liters of water at sites served by a lead service line.	
	Does not allow systematic flushing or aerator removal or cleaning in advance of testing	
Water quality parameter sampling	Adds testing for Chloride and Sulfate	
	Adds testing for pH, alkalinity, and corrosion control inhibitor to taps in the distribution system not just at plant tap, including small and medium supplies	
Recent guidance provided on maintaining corrosion control treatment when changing sources or treatment because the Rule lacked clarity.	Clarify requirements for source water or treatment changes to ensure ongoing maintenance of optimal corrosion control treatment, including OCCT for supplies purchasing water from a supply with OCCT	
The department did not previously designate values for additional water quality control.	The department may designate values for additional water quality control parameters determined by the department.	

