



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



GRETCHEN WHITMER  
GOVERNOR

LIESL EICHLER CLARK  
DIRECTOR

TO: Community Public Water Supply Owner or Operator  
FROM: Eric J. Oswald, Director  
Drinking Water and Municipal Assistance Division  
DATE: March 27, 2019  
SUBJECT: Partial Lead Service Line Replacement Ban



With the onset of construction season, this letter is to re-notify community public water supplies of the current ban on partial lead service line replacements. The details of this ban are in R 325.10604f(5) and (6) of the revised administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399).

The ban on partial lead service line replacements was incorporated into the new lead and copper rule because studies show that partial replacements can increase the amount of lead in a home's drinking water. Partial lead service line replacements can release particulate lead, which can result in unpredictable and potentially very high lead levels. New materials from partial replacements can also increase corrosion rates and create galvanic corrosion.

When conducting service line replacements, no portion of the service line consisting of lead, or galvanized piping currently or previously connected to lead, may remain in place. Returning the line to service for any period of time prior to the removal of all lead, or galvanized piping currently or previously connected to lead, constitutes a partial lead service line replacement and is, therefore, banned. This applies to both private and publicly owned portions of the service line. The expense of the replacement of the private portion of the service line must be covered by the water supply owner, per R 325.10604f(5)(c) and R 325.10604f(6)(e) of Act 399.

It is recommended that full lead service line replacements be conducted per American Water Works Association (AWWA) C810-17 standard, "*Replacement and Flushing of Lead Service Lines.*"

If emergency situations arise that require a temporary partial lead service line replacement, the emergency provisions of R 325.10604f(5)(c)(iii) and R 325.10604f(6)(e)(iv) must be followed. These include notification and sampling requirements. Emergency conditions include accidental incidents of broken water mains or service lines, but do not include any planned construction or service work.

If your community has planned construction in the near future that includes unavoidable partial lead service line replacements, it may be possible to enter into a legally-binding agreement with the Department of Environmental Quality that allows for a limited amount of this work provided certain commitments regarding testing, notification, and follow-up requirements are met. Please contact your district engineer to discuss this option further.

Thank you for your attention to this important matter.