



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
DRINKING WATER AND ENVIRONMENTAL HEALTH DIVISION

Complete Distribution System Materials Inventory (CDSMI) Summary

The Michigan Safe Drinking Water Act, 1976 PA 399, as amended, requires that water supplies develop and maintain a CDSMI. Pursuant to Rule 325.11604(c)(ii), the CDSMI must be submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Federal rule 40 CFR § Part 141.84(a) also requires submission of an inventory by October 16, 2024. To meet both state and federal requirements, **the CDSMI must be submitted to EGLE by October 16, 2024.**

Complete this form if the water supply meets the following definition for service line¹. Refer to page 6 for service line definition. **Note:** Manufactured Housing Community (MHC) connections to units (risers) are considered service lines, so MHCs should fill out this form.

Water Supply: 02310 - City of Flint PWSID²: MI0002310 County: Genesee

PART I: INVENTORY SUMMARY

Enter the number of service lines in each material category. Carefully review each category description below as these categories differ from those requested in the Preliminary DSMI. If you are using the Michigan service line inventory template, the service line material classification is found in the column titled "Federal Classification".

Material Classification	Definition	Number of Service Lines
Lead	Any portion of the service line is known to be made of lead.	722
Galvanized Previously Connected to Lead (GPCL)	The service line is not made of lead, but a portion is galvanized, and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.	120
Non-Lead	All portions of the service line are known NOT to be lead or GPCL through an evidence-based record, method, or technique. Materials may include: <ul style="list-style-type: none"> • Copper • Plastic (PEX, HDPE, PVC, CPVC, etc.) • Galvanized that can be demonstrated were never downstream of lead • Other (brass, etc.) • Unknown Non-Lead (material not known but is known not to contain lead). 	31,914
Lead Status Unknown	The service line material is not known to be lead or GPCL. For the entire service line or a portion of it (in cases of split ownership), there is not enough evidence to support material classification.	3283
Total Number of Service Lines: This is the sum of the cells in the right column and equal to the total number of service lines in the system.		36,039

PART II: SERVICE LINE MATERIAL INVESTIGATION

1. Indicate how all applicable Minimum Service Line Materials Verification (MSLMV) steps were completed:

a. How were service lines of "known" material(s) identified? (Select all that apply.)

- Existing records after 1989
 - Tap cards
 - As-builts
 - Permits
 - Meter replacements
 - Work orders
 - Other _____
- Ordinances or controls (must cover public and private materials)
 - Local ordinance/law
 - Plumbing code
 - Approved/adopted construction specifications
 - Other Lead Service Line Ordinance
- Supply had no existing records after 1989 or ordinances/controls

b. Were any service lines of "unknown" material identified (e.g., did not meet criteria of a "known" service line in question 1.a.)?

- Yes
- No, supply had no "unknown" service lines. Skip to question 3.

c. Were physical verifications completed at randomly selected "unknown" service lines?

- Yes
- No

d. How did the supply physically verify the randomly selected "unknown" service lines?

- Customer Self Identification
- Inspection of Interior Portion of Building
- Inspection of Curb Stop to Building
- Inspection of Main to Curb Stop
- Inspection of Lead connector (gooseneck/pigtail)
- Inspection of Riser for Manufactured Home
- Televising Inspection
- Other _____

2. Did the supply evaluate the data collected from the MSLMV process?

- Yes
- No

a. Describe the level of reliability of the pre-verification records when compared to the field-verified findings collected during the MSLMV.

- Reliable
- Somewhat reliable
- Not reliable or pre-verification records do not exist

b. Was the supply able to utilize reliable records to extrapolate service line materials for other "unknown" service lines in the system?

- Yes - Records were "reliable" and extrapolated to all "unknowns"
- Partially - Some records were reliable and used for extrapolation, but others were unreliable and additional verification was/is necessary
- No - Records were "not reliable" and additional verification was/is necessary

c. If applicable, what additional methods were used to extrapolate or identify service line materials. (Select all that apply.)

- | | |
|--|---|
| <input type="checkbox"/> Era of Housing Construction | <input checked="" type="checkbox"/> Physical verification |
| <input checked="" type="checkbox"/> Eras of Watermain Installation | <input type="checkbox"/> Televising Inspection |
| <input checked="" type="checkbox"/> Eras of Specific projects or contractors | <input type="checkbox"/> Customer Self Identification |
| <input type="checkbox"/> Relationship of adjacent service line material | <input type="checkbox"/> Predictive Modeling (List below) |
| <input type="checkbox"/> Neighboring infrastructure/Material | <input type="checkbox"/> Other (List below) |
| <input checked="" type="checkbox"/> Lead & Copper Water Samples-Sequential | |

If PREDICTIVE MODELING, briefly list the model, program, and/or vendor:

If OTHER, list other methods:

3. What other information can you share about your CDSMI?

PART III: ONGOING ACTIVITIES TO IDENTIFY/RECORD SERVICE LINE MATERIAL DURING NORMAL OPERATIONS

1. During which normal operating activities are you collecting information on service line material? (Select all that apply.)

- | | |
|--|--|
| <input type="checkbox"/> Water meter reading | <input checked="" type="checkbox"/> Water main repair or replacement |
| <input checked="" type="checkbox"/> Water meter repair or replacement | <input type="checkbox"/> Backflow prevention device inspection |
| <input checked="" type="checkbox"/> Service line repair or replacement | <input type="checkbox"/> Other |

If OTHER, explain: _____

2. Do you have standard operating procedures to collect service line material information during normal operations, not including specific service line material investigations?

- Yes
- No

If YES, explain: During regular operations our teams make observations & record information on plumbing type & SL material

PART IV: GENERAL INFORMATION

- 1. Who owns the entire service line in your system? (Select one ownership type.)
 Water system Customer Both (ownership is split)
- 2. Do you have lead goosenecks, pigtails, or connectors in your system?
 Yes Presumed Yes No Unknown
- 3. If applicable, describe when (provide years) lead service lines were generally installed in your system?
According to City of Flint records (tap cards) Lead lines were installed from the early 1900's - 1940's
- 4. If applicable, when were lead service lines banned in your system? Reference the local ordinance that banned the use of lead in your system. _____
- 5. If applicable, what are your plans to identify all services lines that are classified as unknown?
 Identification during normal operating activities. Use a predictive model.
 Physical verification methods Service line replacements
 Other _____
- 6. If you prioritized locations for additional service line materials investigations, beyond the MSLMV, what was your focus (e.g., did you consider environmental justice and/or sensitive populations, did you use predictive modeling, and/or did you target areas with high number of unknowns)? (Select all that apply.)
 Environmental Justice Sensitive populations
 Planned Projects LSL and GRR Prevalence
 High number of unknowns Schools and Daycare facilities
 Predictive modeling Other _____

PART V: PUBLIC ACCESSIBILITY AND SERVICE LINE MATERIALS NOTIFICATION

Service line inventories must be publicly accessible and include an address or unique identifier for each service line. Publicly accessible inventories need to be updated at the same frequency EGLE is updated.

- 1. How are you making your inventory publicly accessible? (Select all that apply.)
 Interactive online map Printed tabular data
 Static online map Information on water utility mailings or newsletters
 Online spreadsheet Hard copy available in office or upon request
 Printed service line map Other
- 2. If your inventory is available online, provide the website. **Note:** Water systems serving greater than 50,000 persons must make the inventory available online.
Website: www.cityofflint.com/progress-report-on-flint-water/
- 3. Have you developed a process to notify owners/occupants at premises served by a lead or GPCL service line within 30 days of determining the service line contains lead or GPCL (this is required per R 325.11604(c)(v))?
 Yes
 No (if NO, contact the Lead and Copper Unit staff)

PART VI. SIGNATURE AND CERTIFICATION

Beyond your service lines, do other documents previously submitted to EGLE, including the General Plan, Reliability Study, issued permits, and/or Asset Management Plan, in combination, properly characterize the materials referenced in CFR 141.42 in the remainder of your current distribution system?

Yes, my general plan, reliability study, issued permits, and/or asset management plan characterize the rest of my current distribution system.

No (if NO, contact your district engineer to update your documentation) *Water Auditor*

System Contact Person: *Entrica Mitchell* Title: *Sewer System Supervisor*

Primary Telephone: *810.766.7077-3418* Email Address: *J.Mitchell@cityofplinton.com*

Person Preparing Inventory (if different than above): _____

Title/Affiliation: _____ Primary Telephone: _____ Email Address: _____

Certification of Complete Distribution System Materials Inventory

I certify that I have reviewed available documentation related to the materials in this water supply's distribution system and the information herein is accurate and complete to the best of my knowledge and information.

Detailed line-by-line inventory is attached.

Ent Mitchell

3-31-25

Signature

Date

Entrica Mitchell

Sewer System Supervisor /

Print Name

Title *Water Auditor*

Submit your completed document and the attached line-by-line inventory to EGLE via your Michigan Environmental Health and Drinking Water Information System (MiEHDWIS) account, or via email to your EGLE district office email address no later than October 16, 2024.

People with disabilities may request this material in an alternate format by emailing EGLE-Accessibility@Michigan.gov or call 800-662-9278.

EGLE does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, disability, political beliefs, height, weight, genetic information, or sexual orientation in the administration of any of its programs or activities, and prohibits intimidation and retaliation, as required by applicable laws and regulations.

This form and its contents are subject to the Freedom of Information Act and may be released to the public.

CDSMI SUMMARY FORM INSTRUCTIONS

This page is provided as a guide to assist with questions that may be asked when completing the summary form. Because water supplies differ significantly in terms of service line materials and records, many questions require a narrative response to allow flexibility. Please provide thorough answers that provide meaningful information about the status of your water supply's service line inventory.

1. **Service Line:** The pipe from the discharge of the corporation fitting to the 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.
2. **PWSID:** The Public Water System Identification (PWSID) is a combination of MI00 plus the water supply's 5-digit WSSN (e.g., if the WSSN is 01234, the PWSID is MI0001234).

Part I: Inventory Summary

This summary table is for reporting the material category for the entire service line. Do not count service lines twice. A service line includes any section of pipe from the water main to the first shut-off valve inside the building or up to 18 inches inside the building, whichever is shorter. The number of service lines in each of the following categories need to be reported:

- **Any Portion Contains Lead:** Any portion of a service line that is made of lead or any lead pigtail, lead gooseneck, or other lead fitting that is connected to the service line, or both. In short, any service line that contains any lead.
- **Galvanized Previously Connected to Lead (GPCL):** A galvanized service line that WAS previously connected to a lead service line, gooseneck, or pigtail. If a galvanized line is still connected to lead, it is considered a lead service line and must be counted in the category above. **Note:** Under the recently promulgated federal Lead and Copper Rule Revisions, service lines in this category are referred to as "galvanized requiring replacement (GRR)."
- **Non-Lead:** Contains neither lead nor GPCL. This category may include service lines of unknown material if they are known not to contain lead or GPCL. If there is a possibility the service line contains lead or GPCL, but the material is unknown, it should be categorized as lead status unknown.
- **Lead Status Unknown:** The service line material is not known to be lead or GPCL and there is not enough evidence to support material classification.

All physically connected potable water services must be included in this table even if there is no current active account. The total number of service lines should be the sum of the cells in the right column and equal to the total number of service lines in the system.

Part II: Service Line Material Investigation

Question 1 requests information about how the water supply met the service line verification requirements of the [Minimum Service Line Material Verification Requirements \(MSLMV\)](#). For this section, "known" and "unknown" refers to those terms as defined in the MSLMV.

Note: Manufactured Housing Communities should refer to these terms as defined in the [Minimum Service Line Material Verification Requirements For Manufactured Housing Communities](#).

Question 2 requests information about how the water supply used information gathered during the MSLMV to further develop their inventory. Guidance for assessing the reliability of records with field-verified materials can be found at [Complete Distribution System Materials Inventory](#).

