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 Subject: Lead Free Act/Plumbing Code
 Date: Tuesday, March 11, 2014 3:56:11 PM

Hello,

This is Michigan's response to your questions below concerning the Lead Free Act and its relation to the Michigan Plumbing Code 2012.

- (1) Does your state adopt the International Plumbing Codes by reference? Other Codes by reference? (EPA understands that the IPC was last revised in 2012 and does not reflect the new requirements.)

Michigan adopts the International Plumbing Code 2012, with amendments, to create the Michigan Plumbing Code 2012 (MPC). All units of government in Michigan who administer and enforce a construction code are required to use the Michigan Plumbing Code 2012 (MPC) which became effective January 17, 2014. However, this latest revised code (revised typically every three years) does not reflect the new lead requirements. An effort is being made to include the lead free definition into the Michigan Residential Code 2012 (MRC) which is not in yet in effect. The MRC applies to one and two family dwellings while the MPC 2012 is the commercial code.

- (2) If your state does not adopt the International Plumbing Codes or other code by reference, has your state already revised its plumbing codes to reflect the new Reduction of Lead in Drinking Water Act standards?

N/A

- (3) If your state has not revised its plumbing codes regulations to reflect the new standards, how does the state intend to implement and enforce the federal law requirement?

All products that are introduced into commerce must meet NSF 61-G or NSF 61/NSF 372 requirements and be marked accordingly using NSF or other ANSI Accredited Third-Party Certification. While enforcement could be a problem after the installation since it is not in the 2012 code, local and state plumbing inspectors are aware of the required accreditation marks. In addition, all licensed plumbers are required to take MPC code update classes where the lead free act revisions are being introduced. The Lead Free Act requirement will be included in MPC 2015 revisions.

- (4) What is your state doing currently or planning to do to implement and enforce the Reduction of Lead in Drinking Water Act?

Local and state plumbing inspectors are aware of the NSF requirements that meet the Lead Free Act and perform inspections and plan review accordingly. All community water supplies have been made aware of the Lead Free Act through training and other educational opportunities throughout the state. In addition,

we have had numerous conversations with manufacturers and contractors responsible for drinking water product specifications. They are aware that drinking water products not meeting the Lead Free Act cannot be introduced into commerce after Jan 4, 2014. To my knowledge all drinking water product installations since Jan 4, 2014 have included the NSF 61-G or NSF 61/NSF 372 or other accredited third party designation.

Thanks

Brock

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