



# Preparing to Meet the Clean Drinking Water Access Act

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School Drinking Water Program

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# Agenda

- Introduction
- New Michigan laws
- Compliance requirements
- Statute information & timelines
- Definitions/keywords
- How to meet the requirements of the filter first law
- Drinking water management plan template
- Sampling requirements
- Funding
- Summary & next steps

# Introduction

- EGLE School Drinking Water Program
  - Provide guidance for schools & child cares
  - Protect the health of children
  - Focus is lead in water
  - Voluntary



# Source Water & System Classification

- Source of water to school buildings
  - From a community (public water supplier)
    - Not required to comply with the Safe Drinking Water Act requirements
    - Now required to comply with the Filter First requirements
  - Not from a community (type 2 noncommunity public water supplier)
    - Must comply with the Lead and Copper Rules
    - Now required to comply with the Filter First requirements
    - Work with the local health department
    - More training to come

# Importance

- Why is this important?
  - Children are especially vulnerable to lead exposure
  - Water quality in building plumbing system can change
  - System is prone to periods of stagnation



Goal is to reduce a route of exposure

# Chasing Lead in a Variable System



One sample is a snap-shot in time of a very small amount of water and should not be used to represent the quality of drinking water at every fixture for every use.

# Michigan Laws

- Effective date October 24, 2023
  - 2023 PA 154 Clean Drinking Water Access Act
  - 2023 PA 155 (amends 1973 PA 116)
  - 2023 PA 173 (amends 1973 PA 116)



# Timeline

April 2024

## **EGLE Requirements**

- By April 24, 2024
- Develop a DWMP template
- Develop guidance documents
- 30-day public comment period
- Provide training

January 2025

## **Schools**

- By January 24, 2025
- Develop a DWMP
- Schools – no longer allowed to install a non-filtered drinking fountain

June 2026

## **Schools**

- By end of 2025-2026 school year
- Have all filters installed
- Post signs
- Conduct filter maintenance
- Start annual sampling
- Conduct annual certification



# Definitions/Keywords



"Bubler Fixture"



"Drinking fountain"



Water cooler

# Definitions/Keywords



“Filtered bottle-filling station”



“Filtered faucet”

# Definitions/Keywords

## Consumptive Fixtures



Kitchen Kettle Fill



Kitchen Faucets



Nurse Room Faucets



Classroom Faucets

# Definitions/Keywords

## Consumptive Fixtures – Others, Outside, & Outbuildings



Athletic Training Rooms



Outdoor Spigots



Concession Stands



# Definitions/Keywords

## Non-consumptive Fixtures



Mop Sinks



Hoses



Science Labs



Restrooms

# Definitions/Keywords

## Inoperable/Shut off Fixtures



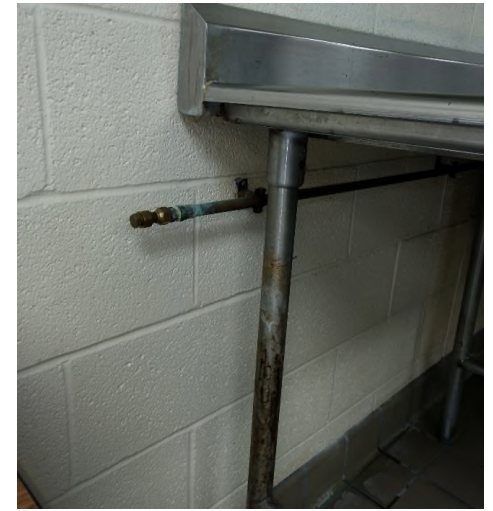
Fixtures shut off



Inoperable fixtures



Rarely or unused fixtures



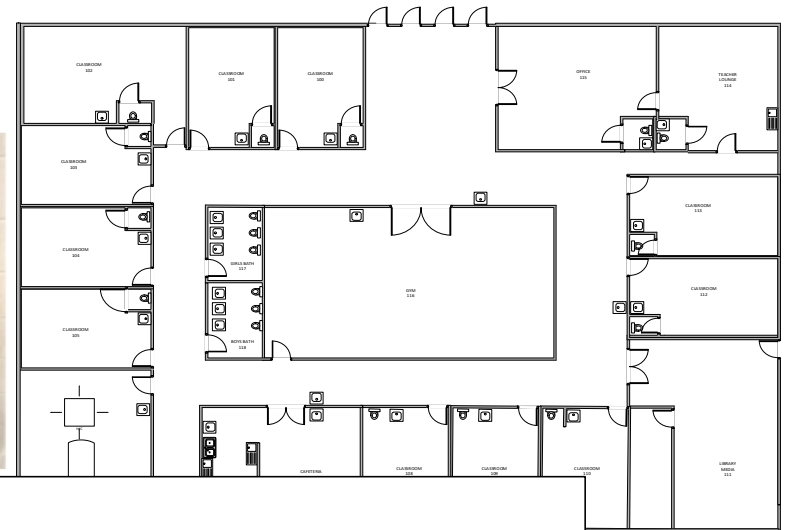
Disconnected faucets creating dead end plumbing

# Filter First Required Steps

1. Initial inventory
  - Locate all existing water outlets
  - Consider how the water is used at each fixture
  - Designate consumptive, non-consumptive, and inoperable/shut-off fixtures
    - Consider long term filter maintenance costs
2. Select fixtures and filters
  - Do the fixtures work for the filters being purchased?
  - What filter is appropriate for the use?
  - Put everything together in a drinking water management plan (DWMP)
3. Install fixtures and filters
4. Implement the DWMP

# Existing Inventory

- Building walk-through
- Floor plan
- Worksheets



## Filter First - Initial Fixture Inventory Worksheet

NOTE: Sequence number 1 starts at the fixture closest to the water point of entry (POE) into the building. Then follow the flow of cold water to subsequent fixtures.

SEQUENCE NUMBER	FIXTURE LOCATION	FIXTURE TYPE*	CURRENT FIXTURE USE			
			Consumption	Nonconsumption	Inoperable	Never to be used
1						



# School Drinking Water Program



Home > About Us > Divisions and Offices > Drinking Water and Environmental Health > School Drinking Water Program

All children need access to healthy water. Michigan children spend a significant portion of their day in school or child care facilities and quality drinking water is critical to a child's overall health, development, and performance.

Water entering a school or child care building is required to meet federal and state drinking water quality; however, due to intermittent water use patterns, more opportunity exists for water stagnation and contaminants such as bacteria, lead, and copper to get into the water.

The EGLE School Drinking Water Program was created to provide guidance and tools for all school and child care facilities regarding communication, plumbing assessments, water management plans, sampling plans, sample collection, interpretation of results, risk reduction actions, and water moving programs for school personnel.

## Contact Information

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517-220-1904



## Facility Administrator Information

[Free Drinking Water Lead Assessment](#)

[Funding for Lead Remediation](#)

[Green Means Go For It Poster](#)

[Green Means Go For It Sink Filter Poster](#)

[Hydration Stations](#)



## Filter First Legislation

This link will take you to information and guidance materials required in the recently passed Clean Drinking Water Access Act.

### Supplemental Tools

- [Initial Fixture Inventory Worksheet](#)

[Filter First Legislation](#) >



## School & Child Care Lead Sampling Dashboard

This is currently under construction. This link will take you to investigative lead test results for schools and child care facilities that volunteered for the free drinking water lead risk assessment.



## Filter First Legislation

This link will take you to information and guidance materials required in the recently passed Clean Drinking Water Access Act.

### Supplemental Tools

- [Initial Fixture Inventory Worksheet](#)

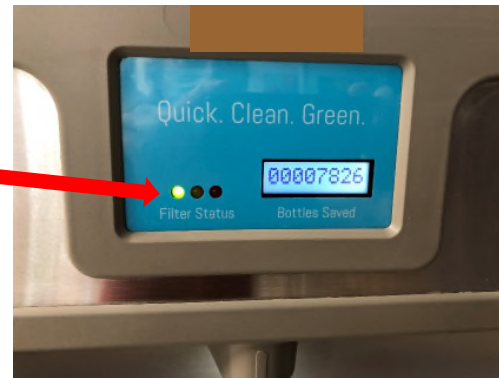
[Filter First Legislation](#) >

[www.Michigan.gov/SchoolWater](http://www.Michigan.gov/SchoolWater)



# Select Filtered Bottle-Filling Stations

Connected  
to  
plumbing



Bubbler

# Select Faucets

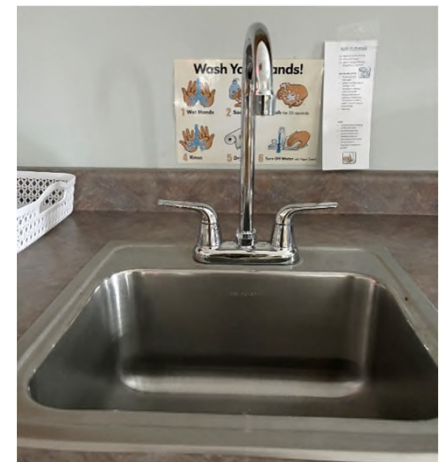
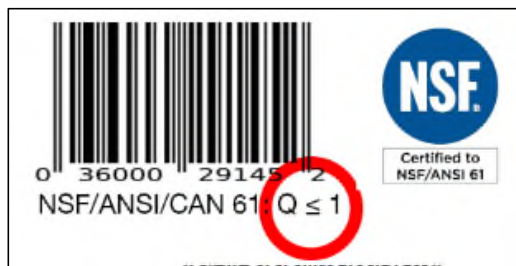
- Capable of attaching POU filter
  - Threaded end
  - Tall enough to fit a filter and a glass/bottle
- Replace with fixtures that are Certified “lead-free” or “low lead”
  - Manufactured after 2014
  - Allowed up to 0.25% lead
  - Meets NSF/ANSI/CAN Standard 61,  $Q \leq 1$





# Fixture Certification

- NSF/ANSI/CAN 61:Q≤1  
Drinking Water System Components  
Health Effects
  - Text will say “NSF/ANSI/CAN 61:Q≤1”
  - Look for a mark like these:



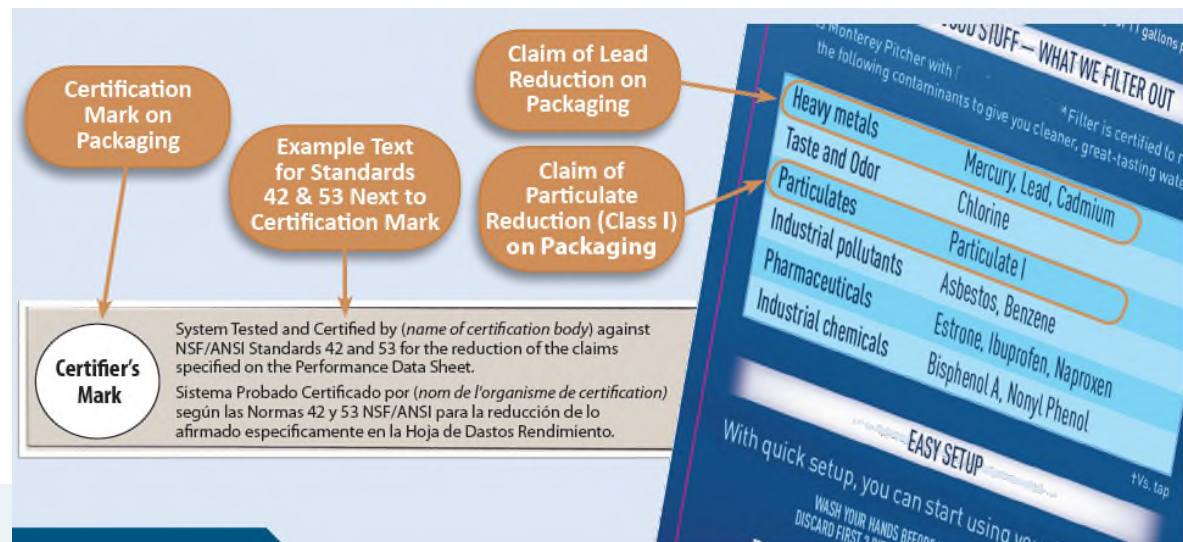
# Filter Certifications

- NSF/ANSI Standard 53 for lead reduction and NSF/ANSI Standard 42 for particulate class I reduction



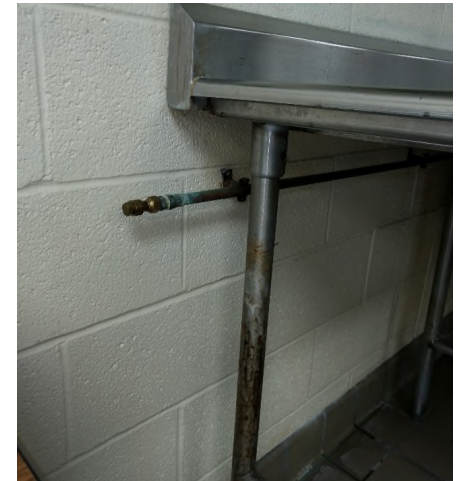
# Filter Information

- Not every filter is certified to meet reduce every contaminant
  - Different technology and manufacturing leads to different results
- Different types of products for different fixtures



# Installation Factors

- Make sure all permits have been obtained
- Remove leaded plumbing materials if possible
- Remove fixtures no longer used or needed
- Shut off or disable
- Install new fixtures
- Flush building water
- Sample



Remove dead-end plumbing



# Post Signs at Fixtures

- For consumption
- Not for consumption



# Drinking Water Management Plan Requirements

- Deadline for creation of the Plan – January 24, 2025
- Submission requirements
  - Only required to submit upon EGLE request
  - Must be always available upon request
- EGLE Template
  - Schools may use their own template if it contains all the required elements (next slide)

# Required Elements of the Plan

**Every 5 Years**

- Specify location of water outlets
  - Location for drinking water, component of food or beverage (consumption)
    - At least one filtered bottle-filling station per 100 students in a school
    - Filtered faucets
  - Location for non-consumption fixtures (mop sink, hand wash sink, etc.)
  - Location where water outlet will be shutoff or rendered permanently inoperable
- Establish a maintenance schedule for:
  - Replacement of filter cartridge for each fixture



Clean Drinking Water Access Act

Drinking Water Management Plan for Schools

<div></div> <hr/>	
School Building Name	
<div></div> <hr/>	<div></div> <hr/>
School Building Code	School District
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Child Care License Number (if one exists within the school building)	
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Responsible Staff Name	Responsible Staff Title
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Responsible Staff Phone Number	Responsible Staff Email Address
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School Year Plan Date	Update Plan Due-By Date
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Annual Sampling Month	Public Water System ID (PWSID)





## Contents

General Information.....	4
Key Terms: .....	4
Acronyms: .....	5
Maintenance Categories:.....	5
Roles and Responsibilities: .....	6
Fixture Identification Code Development Guidelines:.....	7
Forms.....	9
A. Consumption Fixture Inventory:.....	9
B. Non-Consumption Fixture Inventory: .....	11
C. Inoperable Fixture Inventory: .....	14
D. Filter Maintenance Schedule: .....	15
E. Sampling Schedule:.....	17
Appendix A: Summary of the Clean Drinking Water Access Act (2023 PA 154) .....	20
Appendix B: Water Sampling Guidance & Instructions .....	22
Annual Sampling and Testing Result Actions.....	23

**Forms** (retain until updated or 5-year revision – submit only if requested by EGLE)

Separate inventory sheets can be found at [Michigan.gov/SchoolWater](https://www.michigan.gov/SchoolWater).

### A. Consumption Fixture Inventory:

Filter First requires every consumption fixture in a building to be identified and location recorded. The category of each consumption fixture should be specified as a filtered bottle-filling station, filtered faucet, or unfiltered drinking fountain/faucet. "Number" is the order of sampling starting at the fixture closest to the water POE into the building. List here, include additional pages if needed, update as needed and keep a copy for your records.

**Table 2: Filtered Fixture Inventory**

Program/School Year:

Number	Fixture ID Code	Fixture Location	Filter Brand & Model #	Category of Fixture
Ex: 1	WE-100-CF	Preschool room 100	ABC FM-2000B	Filtered faucet
Ex: 2	WE-203H-BF	2 <sup>nd</sup> floor hall by room 203	XYZ FM-2000A	Filtered bottle-filling station
Ex: 3	WE-203-WC	2 <sup>nd</sup> floor hall by room 203	XYC FM-2000A	Filtered bottle-filling station
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**D. Filter Maintenance Schedule:**

The CDWAA requires a filter maintenance schedule. Use this form to track filter maintenance. Drinking water filters are to be checked weekly to be sure they are operational, and the green status light is on. Filters/cartridges must be replaced according to manufacturer's recommendations or if the RED filter status light is showing. Record the date and initials of the person who replaced the filter or cartridge.

**Table 5: Filter Maintenance Schedule**

**Program/School Year:**

Fixture ID Code	Filter Cartridge Model	Filter or Cartridge Replace Date	Initials	Filter or Cartridge Replace Date	Initials	Filter or Cartridge Replace Date	Initials	Filter or Cartridge Replace Date	Initials	Filter or Cartridge Replace Date	Initials
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### E. Sampling Schedule:

Annual water sampling and testing of the filtered water at each filtered bottle-filling station and filtered faucet is required by the CDWAA. Proper sampling procedures must be followed. Sampling instructions can be found in the Appendix. Retain all results for a minimum of 10 years and provide to EGLE, parents and guardians, staff, and the public upon request.

Results that are greater than 5 ppb (0.005 mg/L or 5 ug/L) SHALL be submitted to EGLE within 30 days of facility receipt of the results to the EGLE School and Child Care Water email [EGLE-DWEHD-FilterFirst@michigan.gov](mailto:EGLE-DWEHD-FilterFirst@michigan.gov). Repeat results that are 1-5 ppb (0.001-0.005 mg/L or 1-5 ug/L) SHALL also be submitted to EGLE along with the make/model of filter and/or filter bottle-filling station. Check the result box for the unit reported by the laboratory.

**Table 6: Annual Sampling Schedule**

Program/School Year:

Number	Fixture ID Code	Date Sampled	Sample Result <input type="text"/> mg/L or <input type="text"/> ug/L	Repeat Sample Date (if needed)	Repeat Result <input type="text"/> mg/L or <input type="text"/> ug/L
Ex: 1	WE-100-CF	3/1/23	0		
Ex: 2	WE-101 CF	3/1/23	3	4/1/23	0
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### Drinking Water Filter Check and Replacement Schedule – Multiple Fixtures

Building: \_\_\_\_\_ School Year: \_\_\_\_\_

Drinking water filters should be checked weekly or per manufacturer's recommendations to be sure the GREEN light is on. When the light is YELLOW, be prepared to replace the cartridge, when the light is RED, replace the cartridge immediately. Train kitchen staff and classroom teachers, or aides to check daily. Consider establishing a "filter safety patrol" program involving students.

[illegible]

**Drinking Water Cartridge Replacement Schedule – Individual Fixture**

Building: \_\_\_\_\_ Fixture ID Code: \_\_\_\_\_ Fixture Location: \_\_\_\_\_

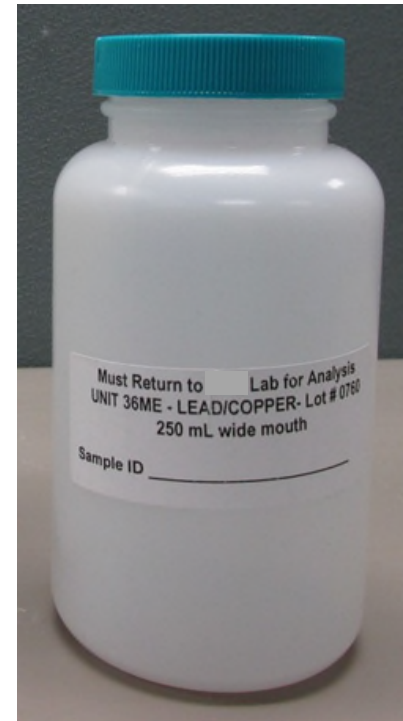
Use this form for an individual faucet or bottle fill water cooler unit. First, enter filter installed DATE. Drinking Water filters should be checked weekly to be sure the **GREEN** light is on. When the light is **YELLOW**, be prepared to replace the cartridge, when the light is **RED**, replace the cartridge immediately. Write the DATE the filter cartridge was replaced. Do not use check marks or X's.

MONTH	SCHOOL YEAR _____	SCHOOL YEAR _____	SCHOOL YEAR _____	SCHOOL YEAR _____
JAN				
FEB				
MAR				
APR				
MAY				
JUN				
JUL				
AUG				
SEP				
OCT				
NOV				
DEC				

[illegible]

# Filter First Sampling Protocol

- Annual testing through the filter
- Methodology
  - Filtered water
  - 250-milliliter bottles
  - After at least an 8-hour stagnation period
  - Certified lab
  - Analyzed for lead



# Filter First Sample Result Response

## 1-5 ppb

- Check filter installation and status
- Resample
  - If result is still 1-5 ppb:
    - Send results EGLE
  - Follow next steps if result is over 5 ppb

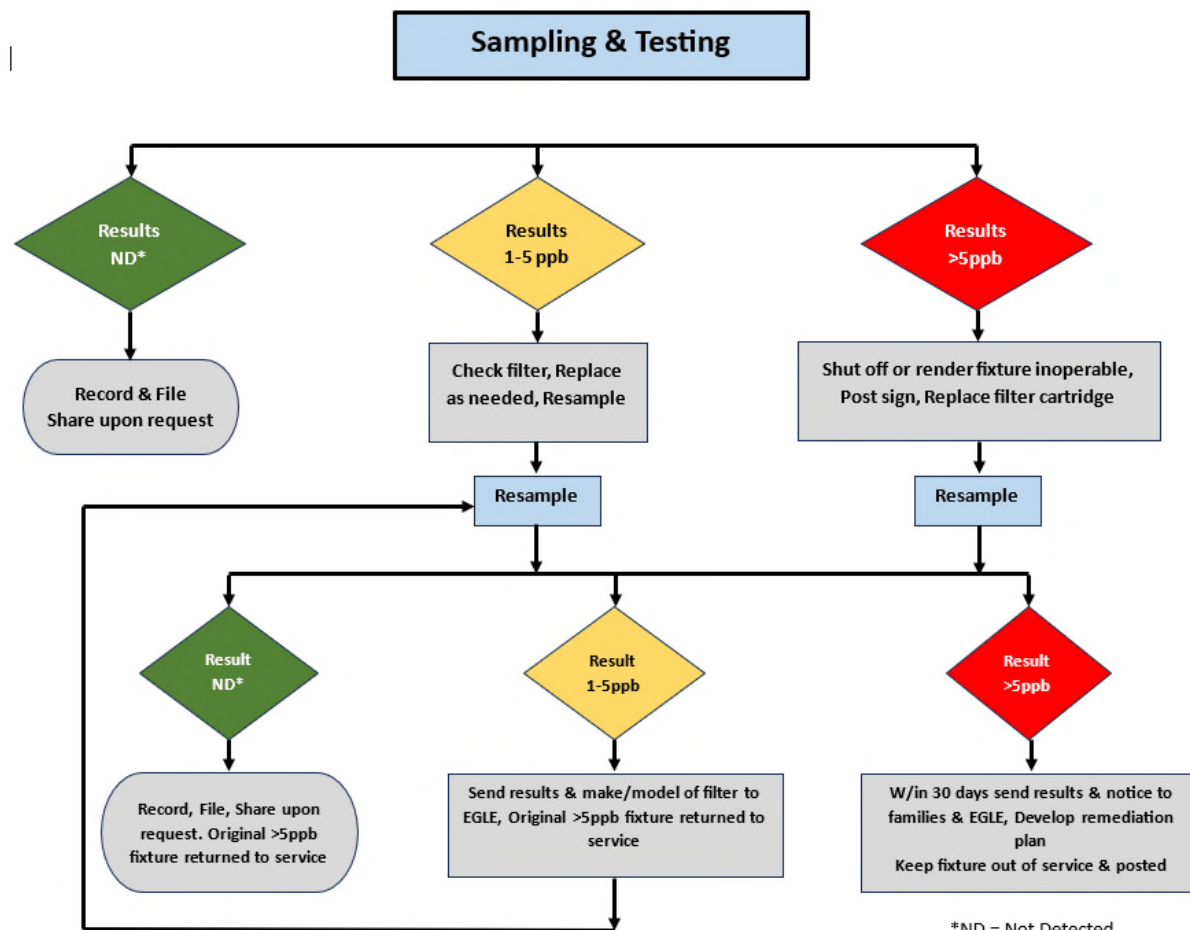
## >5 ppb for any sample taken (original or resample)

- Immediate fixture shut off
- Post sign
- Replace filter cartridge
- Send results to EGLE & notice to families & staff
- Resample
- Still >5 ppb consult with EGLE
  - Develop a remediation plan



This water outlet is inoperable because of high lead concentration.





\*ND = Not Detected

# Funding

- Clean Drinking Water Access Act fund
- Working with the Department of Education for disbursement
- Filtered bottle filling stations are the priority
  - Provides for the 1-time acquisition and installation of 1-filtered bottle-filling station per 100 students
  - Or one per building
- No retroactive reimbursement

# Notification Requirements

- **To EGLE**

Required:

- When resample results are 1-5 ppb
- When results detect lead >5 ppb
  - Make & model of station, faucet & filter

*Recommended:*

*Inform them of the new regulation, why it is important, how they participate, and what you are doing to comply*

- **To staff, students, & families**

Required:

- When results detect lead >5 ppb
  - Notice lead was found in the water
  - Educational information on the health effects of lead exposure and ways to reduce childhood lead exposure

# Schools – Annual Certification

“At the end of the 2025-2026 school year and annually thereafter, each school shall submit to the department documentation, on a form and in a manner prescribed by the department, that certifies that the school has complied with the requirements of this act.”

*I certify that the school has complied with all the requirements of this act*

- ✓ Have and am following a Drinking Water Management Plan
- ✓ Have at least 1 filtered bottle-fill station per 100 occupants
- ✓ Have lead reduction filters on all consumptive fixtures
- ✓ Conducted annual testing & all notification
- ✓ Took action to reduce the risk of lead in the drinking water

# Summary

## Public & Nonpublic Schools

- By January 25, 2025
  - Must have a DWMP
  - Cannot install unfiltered drinking fountains
- By end of 2025-2026 school year
  - Have filters on all consumptive fixtures
  - Submit annual certification of compliance to EGLE
- Report results that detect lead
- Notify families and staff

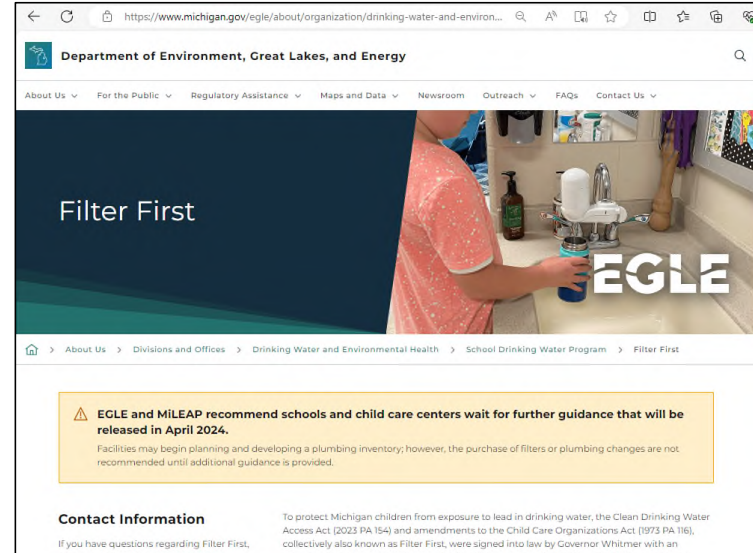


# Summary

- By January 25, 2025
  - Must have a DWMP
  - Cannot install unfiltered drinking fountains
- By end of 2025-2026 school year
  - Must have filters on all consumptive fixtures
  - Submit annual certification of compliance to EGLE
- Report results that detect lead
- Notify families and staff

# Next steps

- Conduct the initial plumbing inventory
  - Designate fixture use
  - Communicate with staff & teachers
  - Begin development of the DWMP
- Visit the Filter First website regularly for new information



[www.Michigan.gov/FilterFirst](https://www.Michigan.gov/FilterFirst)



## Facility Administrator Information

**Free Drinking Water Lead Assessment**

**Funding for Lead Remediation**

 **Green Means Go For It Poster**

 **Green Means Go For It Sink Filter Poster**

**Hydration Stations**

**Investigative Sampling for Lead in Drinking Water**

**Routine Water System Maintenance & Lead Reduction Practices**

**Remediation Efforts for Elevated Lead**

**Training Events & Recorded Webinars**



## Filter First Legislation

This link will take you to information and guidance materials required in the recently passed Clean Drinking Water Access Act.

### Supplemental Tools

- [Initial Fixture Inventory Worksheet](#)

**Filter First Legislation** >



## School & Child Care Lead Sampling Dashboard

This is currently under construction. This link will take you to investigative lead test results for schools and child care facilities that volunteered for the free drinking water lead risk assessment.

[www.Michigan.gov/SchoolWater](http://www.Michigan.gov/SchoolWater)

# The End



[Michigan.gov/FilterFirst](https://Michigan.gov/FilterFirst)  
[Michigan.gov/SchoolWater](https://Michigan.gov/SchoolWater)  
[Michigan.gov/DrinkingWater](https://Michigan.gov/DrinkingWater)  
[Michigan.gov/MILeadSafe](https://Michigan.gov/MILeadSafe)

For questions, send email to:

[EGLE-DWEHD-FilterFirst@Michigan.gov](mailto:EGLE-DWEHD-FilterFirst@Michigan.gov)