

Backflow Prevention Assembly Testing

The issue of licensing and certification requirements for the testing of backflow prevention assemblies has been raised at recent meetings of the State Plumbing Board. As a result, the Bureau of Construction Codes (BCC) and Department of Environment, Great Lakes, and Energy (EGLE) determined it to be appropriate to provide an interpretative statement related to the licensing and certification requirements.

BCC Interpretive Statement – Licensing Requirements

The Michigan Plumbing Code (MPC) requires testing of all backflow prevention assemblies. Testing must occur when the assemblies are installed, immediately after they are repaired, or relocated.

The Michigan Skilled Trades Regulation Act (STRA)¹ regulates the practice of plumbing in the State of Michigan, and it provides that a person shall not engage in or provide plumbing services without a license. MCL 339.6107. “Plumbing” is defined as:

[T]he practice, materials, and fixtures, in or adjacent to a building, structure, or premises, used in the installation, maintenance, extension, or alteration of all piping, fixtures, plumbing appliances, or plumbing appurtenances, as defined in the state construction code, in connection with the sanitary drainage or storm drainage facilities, plumbing venting systems, medical gas systems, *backflow preventers*, and public or private water supply systems. [MCL 339.6103(c) (emphasis added)].

The BCC interprets the term “plumbing” in MCL 339.6103 to encompass the required testing outlined in the MPC. Therefore, it is the BCC’s conclusion that the STRA and the MPC require that the testing of backflow prevention assemblies must be performed by a master plumber, journey plumber, or an apprentice plumber under the direct supervision of a journey or master plumber.

Questions regarding licensing or reports for unlicensed activity may be directed to BCC at LARA-BCC-Licensing@Michigan.gov or 517-241-9313.

EGLE Interpretive Statement – Certification Requirements

As a result of the licensing requirement clarification regarding the testing of backflow prevention assemblies, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) determined it to be appropriate to provide an interpretative statement related to the certification requirements for testing backflow prevention assemblies.

Under the authority of the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399), EGLE evaluates and determines public water supply compliance with the backflow prevention assembly testing requirements. Per Rule 1405 under Act 399, public water supply officials in Michigan must ensure backflow prevention assembly testers have proper credentials before accepting test results from their water customers.

An individual testing a backflow prevention assembly within or connected to a public water supply must hold ASSE 5110 certification.

Questions regarding certification requirements for test results may be directed to the EGLE Environmental Assistance Center (EAC) at EGLE-Assist@Michigan.gov or 800-662-9278.

¹ This written correspondence is offered only as an interpretation of the Michigan Skilled Trades Act and Michigan Plumbing Code pursuant to MCL 24.207(h) and does not have the independent force and effect of law. See also, *Clonlara, Inc v State Bd of Educ*, 442 Mich 230, 240 (1993).