

LEAD AND COPPER IN ILLINOIS

MARY REED

ILLINOIS RURAL WATER ASSOCIATION



LEAD AND COPPER RULE REVISIONS

- **REVISIONS TO THE PB/CU REQUIREMENTS COME FROM MULTIPLE SOURCES:**
 - **STATE LAW (PUBLIC ACT 102-0613)**
 - **FEDERAL LEAD AND COPPER RULE REVISIONS (LCRR)**
 - **ADDITIONAL AMENDMENTS/REQUIREMENTS PENDING AT U.S. EPA LEAD AND COPPER RULE IMPROVEMENTS (LCRI)**

PUBLIC ACT 102-0613

- **(D) AN OWNER OR OPERATOR OF A COMMUNITY WATER SUPPLY SHALL:**
 - **(1) DEVELOP AN INITIAL MATERIAL INVENTORY BY APRIL 15, 2022, AND ELECTRONICALLY SUBMIT BY APRIL 15, 2023, AN UPDATED MATERIAL INVENTORY ELECTRONICALLY TO THE AGENCY; AND**
 - **(2) DELIVER A COMPLETE MATERIAL INVENTORY TO THE AGENCY NO LATER THAN APRIL 15, 2024. THE COMPLETE INVENTORY SHALL REPORT THE COMPOSITION OF ALL SERVICE LINES IN THE COMMUNITY WATER SUPPLY'S DISTRIBUTION SYSTEM.**

PUBLIC ACT 102-0613

- **THE MATERIAL INVENTORY IS DUE TO THE AGENCY BY APRIL 15, 2024. (NOTE: ACCORDING TO LCRR, FINAL INVENTORY IS DUE 10/26/24, BUT THE IL RULE IS MORE STRINGENT)**
- **THE SUBMITTAL SHOULD BE ELECTRONIC TO EPA.LEADANDCOPPER@ILLINOIS.GOV**
- **A COMMUNITY WATER SUPPLY MAY REQUEST AN EXTENSION FOR THE 2024 INVENTORY SUBMITTAL REQUIREMENT. HOWEVER, THAT REQUEST NEEDED TO BE SUBMITTED 3 MONTHS PRIOR TO THE APRIL 15, 2024, DEADLINE OR JANUARY 15TH, 2024.**
- **ONLY 200 SYSTEMS APPLIED FOR THE EXTENSION, SO MOST SYSTEMS HAVE THE COMPLETE INVENTORY DUE APRIL 15TH.**

PUBLIC ACT 102-0613

- **IN 2023 ILLINOIS EPA REQUIRED TWO SUBMISSIONS: A SUMMARY REPORT WAS SUBMITTED THRU THE STATE OF ILLINOIS PORTAL AND A SERVICE LINE SPECIFIC REPORT .PDF WAS TO BE EMAILED TO THE ILLINOIS EPA.**
- **THE SPREADSHEET HAS CHANGED FOR THE 2024 SUBMISSION. THE IEPA UPDATED THE SPREADSHEET TO INCLUDE THE CLASSIFICATION OF THE SERVICE LINE AND SITE IDS FOR SERVICES THAT ARE ON YOUR LEAD AND COPPER SITE PLAN (BOTH ACTIVE AND INACTIVE). YOU WILL NO LONGER NEED TO ACCESS THE PORTAL TO ENTER THE CLASSIFICATIONS.**
- **THE PDF FILE WAS UNREADABLE IN SOME CASES BY THE IEPA. YOU SHOULD PASSWORD PROTECT YOUR SPREADSHEET AND SUBMIT THE EXCEL FILE AS AN ATTACHMENT TO AN EMAIL. IEPA REQUESTS THAT YOU PUT YOUR PWS ID AND NAME IN THE SUBJECT LINE OF THE EMAIL.**

LEAD SERVICE LINE NOTIFICATION

- **PROHIBITS PARTIAL LSLR WITH THE FOLLOWING EXCEPTIONS:**
 - **EMERGENCY REPAIRS:** NOTIFICATION MUST BE PROVIDED TO CUSTOMER IN ADDITION TO INFORMATION REGARDING POTENTIAL RISKS OF ELEVATED LEAD LEVELS
 - PROVISIONS FOR DISTRIBUTION OF POINT-OF-USE FILTERS
 - REPLACING THE REMAINING PORTION OF THE SERVICE LINE WITHIN 30 DAYS (120 DAYS IF CIRCUMSTANCES PREVENT).
 - FOR PARTIAL LSLR, ILLINOIS DEPARTMENT OF PUBLIC HEALTH (IDPH) MUST BE NOTIFIED WITHIN 24 HOURS WITH AND EXPLANATION OF PARTIAL REPLACEMENT AND TIMELINE FOR COMPLETION OF LSLR
 - **IRWA WEBSITE FOR LINKS TO IDPH FORMS:**
[HTTPS://WWW.ILRWA.ORG/DOWNLOADS/LEADTESTING.HTML](https://www.ilrwa.org/downloads/leadtesting.html)

LEAD SERVICE LINE NOTIFICATION

- **NOTIFICATION IS REQUIRED FOR PLANNED LEAD SERVICE LINE REPLACEMENT AT LEAST 45 DAYS PRIOR TO WORK BEGINNING.**
- **IF NO RESPONSE IS RECEIVED WITHIN 15 DAYS OF THE INITIAL REQUEST, THE MUNICIPALITY SHALL ATTEMPT TO POST THE REQUEST ON THE ENTRANCE TO THE BUILDING.**
- **EMERGENCY REPAIR/REPLACEMENT OF LSL REQUIRES IMMEDIATE NOTIFICATION.**
- **WATER SYSTEM DISTURBANCE NOTIFICATION INCLUDING FLUSHING, WATER MAIN REPAIR, METER REPAIR**
 - **(ANYTHING THAT DISTURBS WATER QUALITY TO THE CONSUMER THAT HAS OR MAY HAVE A LEAD SERVICE LINE)**

LEAD SERVICE LINE NOTIFICATION

- **NOTIFICATION LANGUAGE MUST INCLUDE:**
 - A WARNING THAT THE WORK MAY RESULT IN SEDIMENT, POSSIBLY CONTAINING LEAD FROM THE SERVICE LINE, IN THE BUILDING'S WATER.
 - INFORMATION CONCERNING BEST PRACTICES FOR PREVENTING EXPOSURE TO OR RISK OF CONSUMPTION OF LEAD IN DRINKING WATER – INCLUDING RECOMMENDATIONS OF FLUSHING AND FAUCET AERATOR CLEANING.
 - INFORMATION REGARDING THE DANGERS OF LEAD EXPOSURE TO YOUNG CHILDREN AND PREGNANT WOMEN.
 - IEPA HAS A TEMPLATE FOR NOTIFICATION.
 - **[HTTPS://EPA.ILLINOIS.GOV/TOPICS/DRINKING-WATER/PUBLIC-WATER-USERS/LEAD-SERVICE-LINE-INFORMATION.HTML](https://epa.illinois.gov/topics/drinking-water/public-water-users/lead-service-line-information.html)**

SERVICE LINE NOTIFICATION

- **30 DAYS AFTER SUBMITTING YOUR COMPLETE MATERIAL INVENTORY TO THE ILLINOIS EPA YOU MUST NOTIFY THE CUSTOMERS SERVED BY THE FOLLOWING TYPES OF SERVICE CONNECTIONS:**
 - ALL PERSONS SERVED BY A LEAD SERVICE LINE
 - ALL PERSONS SERVED BY A GALVANIZED LINE REQUIRING REPLACEMENT
 - ALL PERSONS SERVED BY A SERVICE LINE IDENTIFIED AS LEAD STATUS UNKNOWN
- IEPA IS WORKING ON A CHECK LIST OF REQUIRED LANGUAGE FOR THESE NOTIFICATIONS.

SERVICE LINE NOTIFICATION

- **TIMING OF THE NOTICE**
 - **INITIAL NOTICE WITHIN 30 DAYS AFTER COMPLETING THE LEAD SERVICE LINE INVENTORY. IT SHOULD BE DELIVERED BY MAIL, OR ANOTHER METHOD APPROVED BY THE AGENCY IN A SEP.**
 - **ANNUALLY REPEAT THE NOTICE TO EACH PERSON UNTIL THE SUPPLIER'S ENTIRE SERVICE CONNECTION IS NO LONGER LEAD, GRR, OR UNKNOWN.**
 - **NEW CUSTOMERS MUST BE PROVIDED THE NOTICE WHEN THE SERVICE IS INITIATED.**

HEALTH EFFECTS OF LEAD

- **SECTION 611.355 (A)(1)(B) OF THE REGULATION STATES:**

THE EXPOSURE TO LEAD IN DRINKING WATER CAN CAUSE SERIOUS HEALTH EFFECTS IN ALL AGE GROUPS. INFANTS AND CHILDREN CAN HAVE DECREASES IN IQ AND ATTENTION SPAN. LEAD EXPOSURE CAN LEAD TO NEW LEARNING AND BEHAVIOR PROBLEMS OF EXACERBATE EXISTING LEANING AND BEHAVIOR PROBLEMS. THE CHILDREN OF WOMEN WHO ARE EXPOSED TO LEAD BEFORE AND DURING PREGNANCY CAN HAVE INCREASED RISK OF THESE ADVERSE HEALTH EFFECTS. ADULTS CAN HAVE INCREASED RISKS OF HEART DISEASE, HIGH BLOOD PRESSURE, KIDNEY OR NERVOUS SYSTEMS PROBLEMS.

SERVICE LINE NOTIFICATION

- **NOTICE CONTENT FOR A CONFIRMED LEAD SERVICE LINE**
 - **EXPLAIN THE HEALTH EFFECTS OF LEAD**
 - **STEPS THE PERSONS CAN TAKE TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER**
 - **INFORM THEM OF OPPORTUNITIES TO REPLACE LEAD SERVICE LINE**
 - **INCLUDING FINANCING SOLUTIONS TO ASSIST IN REPLACING CUSTOMER OWNED PORTIONS OF THE SERVICE LINE**
 - **EXPLAIN THAT THE SUPPLIER MUST REPLACE THE SUPPLIER OWNED PORTION OF THE LSL WHEN THE PROPERTY OWNER NOTIFIES THE SUPPLIER THAT THE OWNER WILL REPLACE THE CUSTOMER-OWNED PORTION OF THE LSL.**

SERVICE LINE NOTIFICATION

- **NOTICE CONTENT FOR A CONFIRMED GALVANIZED
REQUIRING REPLACEMENT SERVICE LINE**
 - **EXPLAIN THE HEALTH EFFECTS OF LEAD**
 - **STEPS THE PERSONS CAN TAKE TO REDUCE
EXPOSURE TO LEAD IN DRINKING WATER**
 - **INFORM THEM OF OPPORTUNITIES TO REPLACE THE
SERVICE LINE**

SERVICE LINE NOTIFICATION

- **NOTICE CONTENT FOR A LEAD STATUS UNKNOWN SERVICE LINE**
 - **EXPLAIN THE HEALTH EFFECTS OF LEAD**
 - **STEPS THE PERSONS CAN TAKE TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER**
 - **INFORM THEM OF OPPORTUNITIES TO VERIFY THE MATERIAL OF THE SERVICE LINE**

LEAD SERVICE LINE REPLACEMENT PLAN

- **BASED UPON THE RESULTS FROM THE COMPLETE LSL INVENTORY A LEAD SERVICE LINE REPLACEMENT (LSLR) PLAN MUST BE SUBMITTED TO THE AGENCY BY APRIL 15, 2024, AND UPDATED EACH YEAR UNTIL APRIL 15, 2027.**
- **SUBMITTAL MUST BE ELECTRONIC TO EPA.LEADANDCOPPER@ILLINOIS.GOV**
- **POST THE “FINAL” LSLR PLAN AND THE COMPLETE INVENTORY ON YOUR WEBSITE –OR- REQUEST THE AGENCY TO POST THEM ON THEIR WEBSITE.**

PUBLIC ACT 102-0613

ILLINOIS EPA HAS DEVELOPED A CHECKLIST OR SELF ASSESSMENT FOR THE LSLR PLAN.

- LEAD SERVICE LINE REPLACEMENT PLAN SELF-ASSESSMENT IT IS AVAILABLE ON BOTH IEPA'S AND IRWA'S WEBSITE.**
- THIS ASSESSMENT SHOULD BE COMPLETED AFTER YOUR PLAN HAS BEEN DEVELOPED TO ENSURE IT MEETS ALL SECTIONS REQUIRED BY SECTION 17.12 OF THE ENVIRONMENTAL PROTECTION ACT.**
- IT ASKS YOU TO CERTIFY THAT YOUR PLAN INCLUDES OF EACH OF THE LEAD SERVICE LINE REPLACEMENT REQUIREMENTS AND NOTE THE LOCATION OF THAT REQUIREMENT IN YOUR DOCUMENT.**
- FAILURE TO INCLUDE ANY REQUIRED INFORMATION IN THE LEAD SERVICE LINE REPLACEMENT PLAN MAY RESULT IN THE PLAN BE REJECTED.**
- IEPA REQUESTS THAT YOU INCLUDE A COPY OF THE CHECKLIST WHEN SUBMITTING THE LEAD SERVICE LINE REPLACEMENT PLAN TO THEM.**

MORE INFORMATION ON 102-0613

- **THE ILLINOIS RURAL WATER WEBSITE HAS A PREVIOUS PRESENTATION THAT SPELS OUT THE SPECIFICS OF THE REPLACEMENT PLAN AND GOES INTO MORE DETAIL ON THE INVENTORY.**
- **[HTTPS://WWW.ILRWA.ORG/TRAINING/TRAINING%20PRESENTATIONS/TRAINING%20PRESENTATIONS.HTML](https://www.ilrwa.org/training/training%20presentations/training%20presentations.html)**
- **GO TO THE TAB LABELED “ILLINOIS LCR REVISIONS”**
- **NOW LET’S MOVE ON TO THE REVISIONS IN ILLINOIS LAW WHICH WERE ADOPTED IDENTICAL IN SUBSTANCE TO THE USEPA’S LEAD AND COPPER RULE REVISIONS (LCRR).**

LCRR (LEAD AND COPPER RULE REVISIONS)

- **LCRR HAS NOW BEEN OFFICIALLY ADOPTED.**
- **COMPLIANCE AND ENFORCEMENT OF THE LCRR WILL BEGIN OCTOBER 2024.**
- **ANY COMMUNITY WATER SUPPLY ON STANDARD 6-MONTH MONITORING MUST FOLLOW LCRR SAMPLING REGULATIONS FOR THE JULY-DECEMBER 2024 MONITORING PERIOD. (LSLS, GRR, UNKNOWNNS, CHANGE IN SOURCE/TREATMENT)**

LCRR (LEAD AND COPPER RULE REVISIONS)

- **ACTION LEVEL (AL) AND TRIGGER LEVEL (TL)**
- **LEAD AND COPPER TAP MONITORING**
 - **SAMPLE SITE SELECTION**
 - **COLLECTION PROCEDURES**
 - **MONITORING FREQUENCY**
- **CORROSION CONTROL TREATMENT (CCT) AND WATER QUALITY PARAMETERS (WQP)**
- **LSL INVENTORY AND LSL REPLACEMENT PLAN**
- **SMALL SYSTEM FLEXIBILITY**
- **PUBLIC EDUCATION AND OUTREACH**
- **CHANGE IN SOURCE OR TREATMENT**
- **SOURCE WATER MONITORING AND TREATMENT**
- **LEAD IN DRINKING WATER AT SCHOOLS AND LICENSED CHILDCARE FACILITIES**

LCRR – ACTION LEVEL & TRIGGER LEVEL

- **A 90TH PERCENTILE LEVEL (P90) ABOVE THE ACTION LEVEL (AL) OF 15 UG/L OR COPPER AL OF 1.3 MG/L THE NEW RULE REQUIRES MORE ACTIONS THAN THE PREVIOUS LCR.**
- **ADDS A TRIGGER LEVEL (TL) OF 10 UG/L THAT TRIGGER ADDITIONAL PLANNING, MONITORING, AND TREATMENT REQUIREMENTS.**

LCRR – ACTION LEVEL & TRIGGER LEVEL

- **CORROSION CONTROL REQUIREMENTS (CCT)**
- **SOURCE WATER REQUIREMENTS**
- **LEAD SERVICE LINE REPLACEMENT AND INVENTORY**
- **PUBLIC EDUCATION AND NOTIFICATION REQUIREMENTS**

- **SUPPLIER MUST COMPLETE STRICT CORROSION CONTROL TREATMENT STEPS TO OPTIMIZE OR RE-OPTIMIZE CORROSION CONTROL BASED ON SIZE, WHETHER THE SUPPLIER CURRENTLY HAS CCT AND WHETHER THE SUPPLIER EXCEEDED THE LEAD TRIGGER LEVEL, LEAD ACTION LEVEL, OR COPPER ACTION LEVEL.**

LEAD AND COPPER TAP MONITORING

- **CHANGES PRIORITIES FOR COLLECTION OF SAMPLES WITH A GREATER FOCUS ON LSL'S**
- **PRIORITIZES COLLECTING SAMPLES FROM SITES SERVED BY LSL'S – ALL SAMPLES MUST BE COLLECTED FROM SITES SERVED BY LSL'S, IF AVAILABLE**
- **NO DISTINCTION IN PRIORITIZATION OF COPPER PIPES WITH LEAD SOLDER BY INSTALLATION DATE**
- **IMPROVED TAP SAMPLE SITE SELECTION CRITERIA**

LEAD AND COPPER TAP MONITORING

- **SELECTING A POOL OF TARGETED SAMPLE SITES**
 - **PLAN NEEDS ENOUGH SITES TO ENSURE SUPPLIER CAN COLLECT THE REQUIRED NUMBER OF SAMPLES**
 - **MAY NOT USE SITES WITH POU DEVICES TO REMOVE INORGANICS**
 - **IF POU OR POE DEVICES ARE NEEDED TO MEET OTHER DRINKING WATER STANDARDS THEY MAY BE SAMPLED IF ALL SERVICE CONNECTIONS HAVE THESE DEVICES**
- **SAMPLING SITE TIERS**
 - **THERE ARE NOW 5 SITE TIERS INSTEAD OF 3**
 - **YOU CAN NOT USE SITES THAT HAVE UNKNOWN SERVICE LINE MATERIALS**

LEAD AND COPPER TAP MONITORING

- **TIER 1** – SINGLE-FAMILY STRUCTURES SERVED THROUGH A LEAD SERVICE LINE.
- **TIER 2** – MULTI-FAMILY STRUCTURES OR BUILDINGS SERVED THROUGH A LEAD SERVICE LINE.
- **TIER 3** – SINGLE-FAMILY STRUCTURES CONTAINING GALVANIZED SERVICE LINE IDENTIFIED AS CURRENTLY OR FORMERLY KNOWN TO BE DOWNSTREAM OF A LEAD SERVICE LINE, LEAD GOOSENECK, PIGTAIL, OR CONNECTOR.
- **TIER 4** – SINGLE-FAMILY STRUCTURES OR BUILDINGS CONTAINING COPPER PIPES WITH LEAD SOLDER INSTALLED BEFORE JUNE 19, 1986
- **TIER 5** – SINGLE-FAMILY STRUCTURES INCL. MULTI-FAMILY RESIDENCES REPRESENTING SITES THROUGHOUT THE DIST. SYSTEM

LCR MONITORING PROCEDURES

- **REQUIRES COLLECTION OF THE 5TH LITER SAMPLE IN HOMES WITH LEAD SERVICE LINES AFTER WATER HAS SAT STAGNATE FOR A MIN. OF 6 HOURS.**
- **MAINTAINS COLLECTION OF THE 1ST LITER SAMPLE IN HOMES WITHOUT LEAD SERVICE LINES AFTER WATER HAS SAT STAGNATE FOR A MIN. OF 6 HOURS.**
- **BEFORE THE 1ST TAP SAMPLING, THE SUPPLIER MUST PROVIDE TO THE AGENCY A COPY OF THE TAP SAMPLING PROTOCOL PROVIDED TO PERSONS SAMPLING. THE AGENCY MUST VERIFY THE FOLLOWING:**
 - **THAT SAMPLES ARE COLLECTED IN WIDE MOUTH BOTTLES**
 - **PROHIBITS SAMPLING INSTRUCTION THAT INCLUDE RECOMMENDATION FOR AERATOR CLEANING/REMOVAL AND PRE-STAGNATION FLUSHING PRIOR TO SAMPLE COLLECTION.**

LCR TAP MONITORING FREQUENCY

- **SYSTEMS WITH LEAD SERVICE LINES WILL RESUME 6-MONTH MONITORING IN JANUARY 2025. (UNKNOWN COUNT AS LEAD)**
- **SOME SAMPLES MAY BE ANALYZED FOR LEAD ONLY WHEN THE LEAD SCHEDULE IS MORE FREQUENT THAN THE COPPER.**
- **SYSTEMS ON ANY TAP MONITORING SCHEDULE MUST OBTAIN PRIOR IEPA APPROVAL BEFORE CHANGING SOURCE OR TREATMENT. THESE SYSTEMS WILL BE ON 6-MONTH MONITORING**
- **LEAD MONITORING SCHEDULE IS BASED ON P90 FOR ALL SYSTEMS**
 - **P90 OVER 15 UG/L: SEMI-ANNUALLY AT STANDARD NUMBER OF SITES**
 - **P90 OVER 10 UG/L (TRIGGER): ANNUALLY AT STANDARD NUMBER OF SITES**
 - **P90 LESS THAN 10 UG/L: ANNUALLY AT THE STANDARD NUMBER OF SITES AND TRIENNIALLY AT REDUCED NUMBER OF SITES USING SAME CRITERIA AS PREVIOUS RULE EXCEPT COPPER 90TH PERCENTILE IS NOT CONSIDERED.**

CONSUMER NOTICE OF TAP RESULTS

- **SUPPLIER MUST PROVIDE A NOTICE OF THE INDIVIDUAL TAP RESULTS TO THE PERSONS SERVED FROM THE LOCATIONS THAT WERE MONITORED.**
- **TIMING OF THE NOTICE**
 - **FOR INDIVIDUAL SAMPLES NOT EXCEEDING 15 UG/L OF LEAD , NO LATER THAN 30 DAYS AFTER THE SUPPLIER LEARNS OF THE TAP RESULTS**
 - **FOR INDIVIDUAL SAMPLES EXCEEDING 15 UG/L OF LEAD, AS SOON AS PRACTICABLE BUT NO LATER THEN **THREE CALENDAR DAYS** AFTER THE SUPPLIER LEARNS OF THE TAP MONITORING RESULTS.**
- **CONTENT OF THE NOTICE**
 - **RESULTS OF LEAD TAP MONITORING FOR LOCATION**
 - **EXPLANATION OF THE HEALTH EFFECTS OF LEAD**
 - **LIST OF STEPS CONSUMER CAN TAKE TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER**
 - **CONTACT INFORMATION FOR UTILITY**
 - **THE MAXIMUM CONTAMINANT LEVEL GOAL AND ACTION LEVEL FOR LEAD, AS WELL AS THE DEFINITIONS FOR THESE TWO TERMS**

CORROSION CONTROL TREATMENT (CCT) AND WATER QUALITY PARAMETERS (WQPS)

- **CCT REQUIREMENTS**
- **LARGE SYSTEMS WITH LEAD ALE**
- **LARGE SYSTEM WITH NO OCCT AND 90TH LEAD ABOVE PQL OR 90TH COPPER ABOVE ALE**
- **MEDIUM SYSTEMS WITH LEAD ALE AND HAS LSLs**
- **SMALL SYSTEMS WITH LEAD ALE AND HAS LSLs AND THEY SELECT THE CCT STEPS TREATMENT OPTION**
- **SYSTEMS SERVING 10,000 PERSONS OR LESS AND NON-TRANSIENT WATER SYSTEMS CAN SELECT AN OPTION OTHER THAN CCT TO ADDRESS LEAD.**

CORROSION CONTROL TREATMENT (CCT) AND WATER QUALITY PARAMETERS (WQPS)

- **CCT OPTIONS**
 - **REMOVES CALCIUM HARDNESS AS AN OPTION AND SPECIFIES ANY PHOSPHATE INHIBITOR MUST BE ORTHOPHOSPHATE**
- **REGULATED WQPS: ELIMINATES PARAMETERS RELATED TO CALCIUM HARDNESS**
- **WQP MONITORING**
 - **SYSTEMS SERVING >50,000 MUST CONDUCT REGULAR WQP MONITORING AT ENTRY POINTS AND IN DISTRIBUTION SYSTEM**
 - **SYSTEMS SERVING <50,000 MUST CONTINUE WQP MONITORING UNTIL THEY ARE NO LONGER EXCEED THE PB OR CU ACTION LEVELS FOR 2 CONSECUTIVE 6-MONTH PERIODS**
 - **TO QUALIFY FOR REDUCED WQP DIST. MONITORING, P90 MUST BE <10UG/L AND SYSTEM MUST MEET THEIR OPTIMIZED WQPS.**

FIND AND FIX FOR SAMPLES EXCEEDED 15 UG/L

- **COLLECT A SECOND TAP SAMPLE AT THE LOCATION THAT EXCEEDED 15 UG/L WITHING 30 DAYS**
- **IF IT IS A LEAD SERVICE LINE, YOU MAY COLLECT ANY LITER OR SAMPLE VOLUME**
- **IF LEAD SERVICE LINE IS NOT PRESENT, COLLECT 1 LITER 1ST DRAW STAGNATION**
- **IF YOUR SYSTEM HAS CCT:**
 - **CONDUCT WQP MONITORING AT OR NEAR THE LOCATION**
 - **PERFORM ANY NEEDED CORRECTIVE ACTIONS**
 - **DOCUMENT CUSTOMER REFUSAL OR NON-RESPONSE AFTER 2 ATTEMPTS**
 - **PROVIDE INFORMATION TO LOCAL HEALTH DEPARTMENT**

PUBLIC EDUCATION AND OUTREACH

- **THERE IS UPDATED HEALTH EFFECTS LANGUAGE FOR ALL PUBLIC EDUCATION MATERIALS AND IN THE CCR (2025)**
- **THE PUBLIC EDUCATION MATERIALS MAY NEED TO BE TRANSLATED UPON CUSTOMER REQUEST**
- **ALL SYSTEMS ARE REQUIRED TO INCLUDE INFORMATION ON HOW TO ACCESS THE LSL INVENTORY AND THE RESULTS OF LCR TAP MONITORING IN THE CCR. (2025 CCR)**
- **REVISES THE MANDATORY HEALTH EFFECTS LANGUAGE TO IMPROVE ACCURACY AND CLARITY.**

PUBLIC EDUCATION AND OUTREACH

- **IF YOUR SYSTEM EXCEEDS THE P90 ACTION LEVEL**
 - CURRENT PUBLIC EDUCATION REQUIREMENTS APPLY
 - SYSTEMS MUST NOTIFY CONSUMERS OF ACTION LEVEL EXCEEDANCE WITHIN 24 HOURS OF RECEIVING RESULTS

ADDITIONAL NOTICE REQUIREMENTS

- DELIVER NOTICE AND EDUCATION MATERIALS TO CONSUMERS DURING WEATHER RELATED WORK THAT COULD DISTURB LSLs.
- PROVIDE INFORMATION TO LOCAL AND STATE HEALTH AGENCIES
- PROVIDE LEAD CONSUMER NOTICE TO CONSUMERS WHOSE INDIVIDUAL TAP SAMPLE IS OVER 15 UG/L AS SOON AS PRACTICABLE BUT NO LATER THAN 3 DAYS.

SCHOOLS AND LICENSED CHILDCARE FACILITIES

- **CWS MUST CONDUCT ANNUAL SAMPLING AT 20% OF ELEMENTARY SCHOOLS AND 20% OF LICENSED CHILDCARE FACILITIES PER YEAR FOR THE 5-YEAR TESTING CYCLE AND CONDUCT SAMPLING ON REQUEST OF ALL SCHOOLS AND LICENSED CHILDCARE FACILITIES THEREAFTER. CONDUCT SAMPLING AT SECONDARY SCHOOLS UPON REQUEST**
 - **COLLECTING 5 SAMPLES PER SCHOOL AND 2 SAMPLES PER LICENSED CHILDCARE FACILITY**
- **SAMPLE RESULTS AND PUBLIC EDUCATION MUST BE PROVIDED TO EACH SAMPLED LICENSED CHILDCARE FACILITY, SCHOOL, AND IEPA.**
- **EXCLUDED ARE FACILITIES BUILT OR THAT REPLACED ALL PLUMBING AFTER JANUARY 1, 2014.**

SCHOOLS AND LICENSED CHILDCARE FACILITIES

- **SUPPLIER MUST REPORT TO THE AGENCY BEFORE JULY 1 OF EACH YEAR THE PREVIOUS CALENDAR YEAR'S ACTIVITY**
 - **CERTIFY THAT A GOOD FAITH EFFORT WAS MADE TO IDENTIFY SCHOOLS AND CHILDCARE FACILITIES. IF CHANGES OCCUR SUBMIT AN UPDATED LIST AT LEAST ONCE EVERY 5 YEARS**
 - **CERTIFY THAT IT DELIVERED INFORMATION ABOUT HEALTH RISKS FROM LEAD IN DRINKING WATER TO THE SCHOOL AND CHILDCARE FACILITIES IT SERVES**

SCHOOLS AND LICENSED CHILDCARE FACILITIES

- **CERTIFY THAT THEY HAVE COMPLETED THE NOTIFICATIONS AND SAMPLING FOR ALL SAMPLING DONE IN A YEAR. REPORT THE FOLLOWING:**
- **THE NUMBER OF SCHOOLS AND CHILDCARE FACILITIES THE SUPPLIER SERVES, AND THE NUMBER SAMPLED IN THE PREVIOUS CALENDAR YEAR**
- **THE NUMBER OF SCHOOLS AND CHILDCARE FACILITIES THAT REFUSED SAMPLING**
- **INFORMATION ABOUT OUTREACH ATTEMPTS FOR SAMPLING THAT A SCHOOL OR CHILDCARE FACILITY DECLINED**
- **THE ANALYTICAL RESULTS FOR ALL FACILITIES SAMPLED IN THE CALENDAR YEAR**
- **THE SUPPLIER MUST ALSO CERTIFY THAT THEY PROVIDED THE SAMPLING RESULTS TO THE SCHOOLS/CHILDCARE FACILITIES, ILLINOIS DEPARTMENT OF PUBLIC HEALTH, AND LOCAL HEALTH AGENCIES**

LCRR SUBPART G

- **SUBPART G IS IN TITLE 35: ENVIRONMENTAL PROTECTION, SUBTITLE F: PUBLIC WATER SUPPLIES, CHAPTER I: POLLUTION CONTROL BOARD, PART 611 PRIMARY DRINKING WATER STANDARDS**

[HTTPS://WWW.ILGA.GOV/COMMISSION/JCAR/ADMINCODE/035/03500611SECTIONS.HTML](https://www.ilga.gov/commission/jcar/admincode/035/03500611sections.html)

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