



## Lead Sampling In Schools Frequently Asked Questions

### **What we know:**

By Illinois and Federal regulation, every five years water systems are required, to identify/certify all primary/secondary schools and child care facilities (CCF) they serve. Further, following identification and within the next five years, water supplies must conduct a one-time monitoring event at all primary schools and CCF served and constructed prior to January 1, 2014. Additionally, water systems must conduct a one-time monitoring event at any secondary school served or primary school constructed after January 1, 2014, that requests monitoring.

*35 IL Adm Code 611.360(i)  
35 IL Adm Code 611.362*

### **The Identification and Certification Process:**

In an excel spreadsheet provided by the Illinois Environmental Protection Agency (EPA), water systems must annually (prior to July 1) provide the following information:

- The number of primary/secondary school and CCF served;
- The number of primary/secondary school and CCF that were advised of the monitoring requirement and refused (or failed to respond back after to at least two notices) to participate;
- The number of primary/secondary school and CCF that refuse to participate following outreach; and
- The number of primary/secondary school and CCF where monitoring was conducted;

Further, annually, the lead sampling results from primary/secondary schools and CCF where monitoring was conducted must be provided to the Illinois EPA and Department of Public Health (DPH).

*35 IL Adm Code 611.360(i)*

### **Lead Monitoring at Primary and Secondary Schools:**

Collect five samples from each school including: two drinking water fountains; a kitchen faucet used for food preparation; a classroom faucet; and a nurse's office faucet. All "lead samples" must be collected by a trained individual. Lead monitoring must be completed in 250 milliliter acidified bottles (normally, the lab acidifies the sample bottles). Samples must be "first draw" following at least an eight-hour stagnation; but, no more than eighteen hours of stagnation.

*35 IL Adm Code 611.362(b)*

### **Lead Monitoring at Child Care Facilities:**

Collect two samples from a drinking water fountain and a kitchen faucet or a classroom or other outlet used for drinking purposes. All "lead samples" must be collected by a trained individual. Lead monitoring must be completed in 250 milliliter acidified bottles. Samples must be "first draw" following at least an eight-hour stagnation; but, no more than eighteen hours of stagnation.

*35 IL Adm Code 611.362(b)*

### **Lead Sampling Exceptions:**

If the water system can't sample from the designated locations, collect samples from other locations used for drinking water consumption. Do not sample from locations with point of use devices unless all outlets are equipped with devices.

*35 IL Adm Code 611.362(b)*

**Lead Sampling Frequency and Notification of Results:**

By January 1, 2030, water systems must complete sampling all CCF, and primary schools constructed prior to January 1, 2014. In addition, they must sample secondary schools and CCF/primary schools constructed after January 1, 2014, that request monitoring. Following the initial five-year monitoring cycle, water systems must sample primary schools, secondary schools and CCF that request monitoring no more than on a five-year frequency.

*35 IL Adm Code 611.362(c)*  
*35 IL Adm Code 611.362(g)(3)*

Water systems must provide monitoring results as soon as possible to the school/CCF; but, no later than 30 days after the laboratory provides the relevant information. Again, as laboratory data becomes available, this information must be provided to the Illinois EPA and DPH in the subsequent annual report.)

*35 IL Adm Code 611.362(f)*

**Outreach/Public Education:**

Annually, water systems must provide information to schools/CCF on the health effects of lead in drinking water, how to request monitoring and information on sampling for lead. Additionally, if a school/CCF requests sampling information must be provided that identifies proper sampling locations (<https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water> ).

*35 IL Adm Code 611.362(g)*

Again, the annual notice to schools/CCF must include information indicating that the supplier must supply an opportunity for lead monitoring as described above, health risk information on lead, a proposed monitoring schedule for those choosing to participate, information about lead monitoring and risk reduction (<https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water> ). If a school/CCF wishes to participate and agrees to the proposed schedule, they should be again notified of the monitoring event thirty days prior to the scheduled time. If a school/CCF declines participation or fails to respond to two notices information this fact must be annually provided to the Illinois EPA and DPH.

*35 IL Adm Code 611.362(a)*

**Record retention:**

Water systems must retain information on the school and CCF identification and lead monitoring program for twelve years.

*35 IL Adm Code 611.362*

**Do School/CCF samples count in the lead Ninetieth Percentile Calculation:**

Samples DO NOT count toward the 90<sup>th</sup> percentile concentration.

Further detail: 90<sup>th</sup> percentile concentration" means the concentration of lead or copper the supplier computes under subsection (c)(4) using the results of tap water sampling under Section 611.356. In Section 611.362 Monitoring for Lead in Schools and Child Care Facilities is the regulation for schools and 90% is not included.