

PFAS Update

February 18, 2026



IPCB Rulemaking

- ▶ PFAS MCL, CCR3, LCRI

New PFAS Rule

- ▶ On April 26, 2024, U.S. EPA published the National Primary Drinking Water Regulation for six PFAS.

Chemical	Maximum Contaminant Level Goal (MCLG)	Maximum Contaminant Level (MCL)	Trigger Level	Practical Quantitation Level (PQL)
PFOA	0	4.0 ppt	2.0 ppt	4.0 ppt
PFOS	0	4.0 ppt	2.0 ppt	4.0 ppt
PFHxS	10 ppt	10 ppt	5 ppt	4.0 ppt
HFPO-DA (GenX Chemicals)	10 ppt	10 ppt	5 ppt	5.0 ppt
PFNA	10 ppt	10 ppt	5 ppt	4.0 ppt
Mixture of 2 or more: PFHxS, PFNA, HFPO-DA, and PFBS	Hazard Index of 1	Hazard Index of 1	Hazard Index of 0.5	PQLs are listed above. PQL is 3.0 ppt for PFBS.

$$\text{Hazard Index} = \left(\frac{[\text{GenX}_{\text{water}}]}{[10 \text{ ppt}]} \right) + \left(\frac{[\text{PFBS}_{\text{water}}]}{[2000 \text{ ppt}]} \right) + \left(\frac{[\text{PFNA}_{\text{water}}]}{[10 \text{ ppt}]} \right) + \left(\frac{[\text{PFHxS}_{\text{water}}]}{[10 \text{ ppt}]} \right)$$



PFAS – Initial Monitoring

- ▶ Initial monitoring must be completed by 4/2027
- ▶ Samples taken at entry point

Water Source	System Size	Sampling Frequency
Surface water, GWUDI, or mixed (GW & SW) EPTDS	All	Four (quarterly) samples 2 to 4 months apart in a consecutive 12-month period at the entry point to the distribution system (EPTDS).
Groundwater EPTDS	Large (>10,000 served)	Four (quarterly) samples 2 to 4 months apart in a consecutive 12-month period at EPTDS.
Groundwater EPTDS	Small (≤10,000 served)	Two (semiannual) samples in a consecutive 12-month period and must collect the samples 5 to 7 months apart at EPTDS.

PFAS – Initial Monitoring

- ▶ CWS can request to use previously collected data to meet initial monitoring requirements IF:
 - ▶ Data was collected 2019 or later
 - ▶ Analyzed using 533 or 537.1
 - ▶ Analyzed using reporting limits \leq the MCLs
 - ▶ MRL must be \leq the trigger level to qualify for reduced monitoring
- ▶ 184 CWS currently meet the initial monitoring requirements through UCMR5 sampling
- ▶ If **all** initial monitoring results are $<$ the trigger level, the CWS qualifies for reduced (triennial) monitoring.
 - ▶ If not - quarterly

Compliance Monitoring

- ▶ Compliance monitoring begins April 25, 2027
- ▶ Compliance with the MCLs begins April 26, 2029
- ▶ Water systems will be required to issue public notification for violations and report these violations in their Consumer Confidence Reports
- ▶ Returning to compliance with the MCLs may include:
 - ▶ Removing wells from service
 - ▶ Purchasing water from another system
 - ▶ Providing treatment for PFAS removal (permits required)
- ▶ 45 single sample exceedances from PFAS Monitoring Network data



U.S. EPA Best Available Technologies for PFAS in Drinking Water

- ▶ Granular activated carbon
- ▶ Anion exchange
- ▶ Reverse osmosis & nanofiltration

- ▶ Other non-treatment options to return to compliance with the MCL:
 - ▶ Interconnection with another system
 - ▶ Source relocation



Questions?

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Lead and Copper Updates

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Current Lead and Copper Rule Reminders

- ▶ The Lead and Copper Rule Revisions went into effect on Oct 16, 2024 in Illinois.
- ▶ Sampling changes
 - ▶ Sample site plans needed to be re-submitted to re-tier sample sites.
 - ▶ Water supplies with lead service lines must use only lead service line addresses as sample sites. If there are not enough lead service line addresses to complete the sample site plan all lead service line addresses must be used before adding any non lead addresses.
 - ▶ Lead and Copper samples from Tier 1, 2 and 3 sample sites (Lead or GRR Service lines) must be taken using the first- and fifth-liter draw method.



Current Lead and Copper Rule Reminders

▶ Water Quality Parameter Sampling

- ▶ Samples for pH, Alkalinity, and Orthophosphate are not required to be sent to a certified lab for analysis. If a water supply has the ability to analyze these samples using the required methods the results can be submitted directly to the Illinois EPA as long as the method that was used to analyze the sample is included.
- ▶ If the supply does not have the ability to analyze the samples using the required methods that should be sent to a certified lab for analysis.



Current Lead and Copper Rule Reminders

- ▶ Find-and-Fix assessment
- ▶ After an individual lead sample result over the action level of 0.015 mg/L (15ppb) the water supply is required to complete a Find-and-Fix site assessment at that individual lead sample site.
 - ▶ Find-and-Fix assessment steps after receiving high sample result:
 - ▶ Step 1 - Collect water quality (pH, Alkalinity, and Orthophosphate if used) within 5-days (14 days for small systems with no CCT) from a sample site on the same sized water main, in the same pressure zone, and located within half a mile of the original high lead sample site. **Original high lead sites can be used for WQP samples.**
 - ▶ Step 2 - Collect a follow-up lead sample within 30 days.
 - ▶ Step 3 - Submit Find-and-Fix OCCT recommendation within six-months. This recommendation is only for the individual sample site, suppliers actively re-optimizing their CCT treatment do not need to submit a recommendation.



Current Lead and Copper Rule Reminders

▶ Inventories and Replacement Plans

- ▶ Inventories and replacement plans must be submitted each year for any water supply that has any Lead, GRR, or unknown service lines.
- ▶ Water supplies that have unknowns but no lead or GRR service lines must submit a replacement plan that details the process for identifying the unknown service lines.
- ▶ Inventories and replacement plans are due on April 15, 2026. should be submitted via email to EPA.Leadandcopper@illinois.gov



Current Lead and Copper Rule Reminders

Service Line Material Inventory

- ▶ Goosenecks / Pigtails / Lead Fittings
 - ▶ Service lines of any material connected to a lead gooseneck should be classified as a lead service line.
 - ▶ If the gooseneck is the only lead section of service line and the service line is not a GRR service line, only the gooseneck needs to be replaced.
 - ▶ If a lead gooseneck is encountered during any infrastructure work, it must be replaced immediately.
 - ▶ Suppliers are not required to pay for the gooseneck replacement.
 - ▶ Goosenecks are not required to be replaced if the customer objects to it at the



Current Lead and Copper Rule Reminders

Lead Service Line Replacement Plans

- ▶ Replacement Plans are due on April 15th each year until April 15th 2027 when the final replacement plan is due.
- ▶ Each Community Water Supply that has any Lead, GRR, or unknown service lines must submit a replacement plan each year.
- ▶ Replacement plans should also detail the process used for identifying unknown service lines.



Current Lead and Copper Rule Reminders

Lead Service Line Replacement

- ▶ Mandatory lead service line replacement is currently required under the following situations.
 - ▶ In the event of an emergency repair on a lead service line, a full lead service line replacement must be conducted on that service line within 30 days of the repair.
 - ▶ When a watermain is replaced, all lead service lines connected to the water main must be replaced during the water main replacement.
 - ▶ If a customer notifies the water supply that they are replacing the customer owned side of a lead service line, the supply must replace the supply owned side within 45 days.
 - ▶ After a Lead Action Level Exceedance at an annual rate of 3% over a two-year rolling average
 - ▶ After a lead Trigger Level Exceedance at an annual rate agreed to by the Illinois EPA (Usually 1% annually over a two-year rolling average)



Current Lead and Copper Rule Reminders

▶ Filter Distribution

- ▶ After each lead service line replacement, a filter and six-months worth of replacement cartridges must be provided.
- ▶ Filters must be provided in the event of an emergency repair on a lead service line.
- ▶ After a disturbance to a lead service line from water meter or gooseneck/pigtail replacement, filters must be provided with six-months worth of replacement cartridges.



Current Lead and Copper Rule Reminders

- ▶ School and Childcare Facility Monitoring
 - ▶ List of schools and childcare facilities should be submitted ASAP if not submitted already.
 - ▶ The second year of the 5-year monitoring period is this year - 2026.
 - ▶ School and Childcare sampling
 - ▶ 20% of all elementary schools (consisting of any grades Pre-K through 8th grade)
 - ▶ 20% of all registered Daycares
 - ▶ Provide notice each year to all schools and daycares with information about the health risks of lead and a proposed sampling schedule for each facility.



Upcoming Lead and Copper Rule Change – Lead and Copper Rule Improvements

- ▶ Lead and Copper Rule Improvements (LCRI)
 - ▶ The LCRI was finalized by US EPA on October 8, 2024 and builds off of the existing Lead and Copper Rule Revisions.
 - ▶ The LCRI has a compliance date of November 1st, 2027.
 - ▶ The current Lead and Copper Rule Revisions will remain in effect until the LCRI compliance date.



LCRI Content

- ▶ Mandatory Full-Service Line Replacement
 - ▶ All CWS required to replace all Lead and GRR service lines within 10 years.
 - ▶ 10% Annual replacement rate
 - ▶ First “annual” period is November 1, 2027 – December 31, 2028.
 - ▶ Only full service line replacements count towards the replacement rate.
 - ▶ First rate calculation is at the end of the third program year, 2030.



LCRI Content

- ▶ Replacement Plans
 - ▶ LCRI will add the requirement for all CWS to identify any laws, regulations, municipal codes and water tariff agreements that effect access for private side full service line replacement.
- ▶ Inventory
 - ▶ Adds requirement to identify connectors for each service line on the inventory.
- ▶ Inventory validation
 - ▶ Lines classified as non-lead by any means other than documented installation date after 1988, two-point visual inspections, previous LSL replacement will be added to a validation pool.
 - ▶ Number of required validations depends on size of the validation pool



LCRI Content

▶ Tap Sampling

- ▶ First and Fifth Liter sampling will analyze both the first and fifth liter for lead and copper. The highest level between the first or fifth liter will be used for the compliance calculation for the action level.

▶ Sample Site Tiers

- ▶ Premise plumbing will be included in the tiering requirements.

▶ Sample Site Selection

- ▶ Sample sites are not required to be included if the customer refuses or fails to respond after two contact attempts.



LCRI Content

▶ Standard monitoring

- ▶ CWS that are not currently following the LCRI first and fifth liter sampling procedure will be required to start standard monitoring in 2028.

▶ Action Level

- ▶ The LCRI will remove the lead trigger level and change the lead action level to 0.010 mg/L (10 ppb)

▶ Sample invalidation

- ▶ LCRI adds the ability for states to invalidate a sample due to improper collection method or when a sample comes from a site that does not represent normal water usage.



LCRI Content

▶ Corrosion Control Treatment

- ▶ Adds the ability for systems to defer adding OCCT if they replace all Lead/GRR service lines within five years

▶ Small Supplier Compliance Flexibility Options

- ▶ Population cutoff adjusted from 10,000 down to 3,300

▶ Find and Fix

- ▶ LCRI renamed to Distribution System and Site Assessment (DSSA)
 - ▶ Adds lead public education distribution requirement for high lead sample sites

▶ Filter distribution

- ▶ Any CWS with three lead action level exceedances within five years must make filters available to customers.



Questions?

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