

LEAD AND COPPER

DAVE MCMILLAN

ILLINOIS RURAL WATER ASSOCIATION



OVERVIEW OF LEAD AND COPPER STATUTORY/REGULATORY CHANGES

- **Today's topics**
 - **Service line material inventory**
 - **Lead service line replacement**
 - **Consumer notifications**
 - **Changes to how/where monitoring is conducted for lead and copper**
 - **Touch on a few other regulatory issues/provisions**

LEAD AND COPPER RULE REVISIONS

- **Revisions to the Pb/Cu requirements come from multiple sources:**
 - State Law - Public Act (PA) 102-0613
 - Federal Lead and Copper Rule Revisions (LCRR) – identical in substance regulation 35 IL Adm Code 611.355
 - Additional amendments/requirements pending, U.S. EPA Lead and copper Rule Improvements (LCRI)

PA 102-0613 SERVICE LINE INVENTORY

- **Supplies had to 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
- **Supplies had to deliver a complete material inventory to the Agency no later than April 15, 2024.**

PA 102-0613 INVENTORY CONTINUED

- **the service line Material Inventory was due to the Agency by April 15, 2024.**
 - LCRR, Final Inventory is due 10/16/24, IL law is more stringent so April 15 is the date!
 - The submittal should be electronic to epa.leadandcopper@illinois.gov
 - The Reporting spreadsheet changed for the 2024 submission
 - The Illinois epa updated the spreadsheet to include the classification of the service line and site ids for services that are lead and copper sampling sites (both active and inactive).

LCRR/PA 102-0613 - SERVICE LINE MATERIAL NOTIFICATION

30 days after submitting the service line inventory, supplies must notify 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
- **Language of notification very similar to health protection information previously supplied under old LCR**
 - <https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/drinking-water/public-water-users/documents/lead-service-line-replacement-advisory-board/lead-informational-notice.pdf>

SERVICE LINE MATERIAL NOTIFICATION, CONTINUED

- **Timing of the notice**
 - Initial notice within 30 days after completing the 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.

PA 102-0613 - SERVICE LINE REPLACEMENT PLAN

- **Supplies submitted plans by April 15, 2024,**
 - Submittal must be electronic to epa.leadandcopper@illinois.gov
 - must update their plan each year until April 15, 2027
- **Post the “Final” LSL Replacement plan and the complete inventory on the supply’s website**
 - **Or - request the Illinois epa post them on their website**
 - Illinois epa is advising supplies that have a website that it is best to post locally

SERVICE LINE REPLACEMENT PLAN, CONTINUED

- **PA 102-0613 Minimum replacement schedule:**

LSLs	Annual Replacement Rate	Completion Timeline
1 – 1200	7%	15 years
1201 – 4999	6%	17 years
5000 – 9999	5%	20 years
10,000 – 99,999	3%	34 years
> 100,000	2%	50 years

- **LSL= LEAD, GALVANIZED DOWNSTREAM OF LEAD OR UNKNOWN SERVICE LINES!**

IMPORTANT PROVISION IN PA 102-0613

Prohibits partial LSL Replacement 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, e.g. weather)
- 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>

PA 102-0613 - LSL REPLACEMENT NOTIFICATION

- **Notification is required for planned Lead service line replacement at least 45 days prior to work beginning**
- **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
- **IEPA has a template for notification**
 - <https://epa.illinois.gov/topics/drinking-water/public-water-users/lead-service-line-information.html>

LCRR/35 IL ADM CODE 611 (LEAD AND COPPER RULE REVISIONS)

- **Action Level (AL) and trigger level (TL)**
- **Lead and copper monitoring**
 - **Sample site selection**
 - **Collection procedures**
 - **Monitoring frequency**
- **Corrosion control treatment (CCT) and water quality parameters (wqp)**
- **Lsl inventory and lsl replacement plan**
- **Find and fix provisions**
- **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 DISCUSSION WILL

- **Focus on areas not covered in Statutory and regulatory overlap / “stuff” previously discussed**
- **Again, not a comprehensive discussion**
 - Just trying to hit the high points

LEAD AND COPPER MONITORING

- **Changes priorities for collection of samples with a greater focus on Isl's**
 - Prioritizes collecting samples from sites served by Isl's – all samples must be collected from sites served by Isl's, if available
- **Changes site sample collection criteria**
 - There are now 5 site tiers instead of 3
 - can not use sites that have unknown service line materials
 - No sampling from homes with POU devices (including water softeners)

LEAD AND COPPER MONITORING, CONTINUED

- **New first and fifth liter sampling procedures for LSL locations**
 - Maintains 6 hour stagnation
 - Precludes sampling instruction that include recommendation for aerator cleaning/removal and pre-stagnation flushing prior to sample collection
 - samples must be collected in wide mouth bottles
- **Increased monitoring**
 - Systems with lead service lines will resume 6-month monitoring in January 2025.
(unknowns count as lead)
- **Continued consumer notice of results**
 - Supplier must provide a notice of the individual tap results to the persons served from the locations that were monitored

LCRR – ACTION & TRIGGER LEVEL

- **Addition of a Trigger level - Adds a TL of 10 ug/L that initiates additional planning, monitoring, and treatment requirements**
 - Maintains old Action 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
- **exceeded the lead trigger level, lead action level, or copper action level**
 - 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

LCRR - CORROSION CONTROL TREATMENT (CCT) REQUIREMENTS

More stringent CCT for large supplies with:

- Lead action level exceedance (ALE)
- No Optimal CCT and a 90th percentile lead concentration above the practical quantification limit or 90th percentile copper concentration above ALE

Medium systems with Isl and a Lead ALE

Small systems with LSL, a Lead ALE and selecting the CCT steps treatment option

- Note: Systems serving 10,000 persons or less and non-transient water systems can select an option other than cct to address lead.



CCT REQUIREMENTS , CONTINUED

- **Removes calcium hardness as an option and specifies any phosphate inhibitor must be orthophosphate**
 - Also, eliminates water quality parameters (WQP) 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 <10 ug/l and system must meet their optimized wqps.

LCRR- 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 sample
- **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

LCR – SCHOOLS/LICENSED CHILDCARE FACILITIES TESTING

Excluding facilities built or that replaced all plumbing after January 1, 2014, cws must Collect 5 samples per school and 2 samples per licensed childcare facility as follows:

- annual sampling at 20% of elementary schools and 20% of licensed childcare facilities per year for the 5-year testing cycle
- sampling on request of all schools and licensed childcare facilities thereafter
- sampling at secondary schools upon request

Sample results and public education must be provided to each sampled licensed childcare facility, school, and Iepa



MORE INFORMATION ON LCRR/PA 102-0613

- This presentation will be posted on the IRWA's website under the training tab
- Also, The Illinois rural water website has previous presentations that have more specifics on the law and regulations:
 - <https://www.ilrwa.org/Training/Training%20Presentations/Training%20Presentations.html>
- 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>
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QUESTIONS?

W. David McMillan, P.G.
Drinking Water Training and Technical Assistance Specialist
Illinois Rural Water Association
PO Box 49
Taylorville, IL 62568
mcmillan@ilrwa.org
Cellular Phone: 217-370-6485

