Update - ISAWWA

IEPA – LEAD & COPPER CORROSION CONTROL REGULATIONS

Senate Bill - 550
(aka) Public Act 099-0922
Testing for Lead in Schools
SENATE BILL (SB) 550

Focus of Senate Bill (SB)-550 primarily dealing with testing for lead in drinking water at schools and day care facilities

**Original SENATE BILL**

- drafted by environmental groups and Illinois Attorney General’s office
- assumed lead was in source waters
- water providers pay for all the testing

**ISAWWA was asked to comment on bill**

**FINAL SENATE BILL**

- after months of negotiations between AG’s office, schools, ISAWWA, IRWA, IML - resulted in SB-550 with some science and little additional impact to water providers
Requirements of SB-550 - Schools

Schools are required to test all water sources used for cooking and drinking in all schools where K thru 5th graders are present that were built before January 1, 2000
SB 550- IDPH

Within 90 days from effective date, IDPH must provide mitigation strategies for schools on their website.

In process!
Water Providers must develop a service line inventory

• List the total number of service lines in system, including privately owned
• List the number of known lead service lines, including privately owned
• List the number of lead service lines added from the previous year

• Note:
  • CWS are not required to unearth for sole purpose of identification
  • EPA strongly suggests no partial lead service line replacement
Inventory Submittal To IEPA

• CWS shall submit inventory, either written or electronic format, to IEPA by April 15, 2018 and annually by April 15, each year after, until all lead is removed from system

• After January 1, 2018 IEPA will request information during routine audit of CWS
Construction - Notification Requirements

**Must provide written notification 14 days prior to any planned work in areas of known or suspected lead service lines to all affected residences**

If work is on emergency basis, notification shall be as soon as possible after work completed

Must notify affected resident when repairing or replacing a water meter at time work is initiated
*Warning*
Work may result in sediment, possibly containing lead, in residence water supply.

1. Must include information concerning best practices for mitigating risk to consuming water containing lead, i.e. flushing water for 5 minutes

2. Information regarding the hazards of lead in drinking water
Required Public Notification Information

• If significant (>10%) of population is non-English speaking must contain information, in appropriate language, and contain phone number or address on how to obtain a translated copy of warning

• If disruption is a community wide event, notification can be made by local media, social media or other method

• For multi-dwelling complexes, written notification shall be posted at primary entrance
SB-550 - Notification - Exceptions (waivers)

APPLY TO IEPA FOR WAIVER IF:

Certify **no lead** in the system

Certify **areas of community** where there are no lead service lines

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SB -550 Similar to April 18, 2016 IEPA letter from Lisa Bonnett to Water Providers

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

April 18, 2016

Dear Water Supply Official:

Following the high-profile situation in Flint, Michigan, the Illinois Environmental Protection Agency has identified several enhancements to public health protection as the federal Lead and Copper Rule is being implemented. Those enhancements include action items to be taken by Community Water Supplies (CWSs).

ACTION ITEMS!

- PROMPT NOTIFICATION OF LEAD TESTING EXCEEDANCE
- PUBLIC NOTICE OF WATER MAIN OR SERVICE LINE CONSTRUCTION WORK
- NOTICE TO REVIEW SAMPLING SITES
- VERIFY SOURCE WATER STABILITY AND PUBLIC NOTICE REQUIREMENTS
- FOLLOW-UP ON WATER QUALITY COMPLAINTS
- SYSTEM MATERIALS INVENTORY – (LEAD PIPE INVENTORY)

* REVIEW THE LETTER FOR DETAILS
SB 550 and April 18, 2016 IEPA Letter

• Which one do we follow?
• We must follow both
ISAWWA- HOW CAN WE HELP

ISAWWA – Resources – In-Progress

• Sample notification letters
• Sample door hangers
• Webinars to educate water providers on following
  • SB 550
  • How to develop a sampling plan
  • How to help schools develop a water management plan
  • Factors to consider when creating a lead service line inventory

www.isawwa.org
Communicating About Lead Service Lines:
A Guide for Water Systems Addressing
Service Line Repair and Replacement

American Water Works Association
Dedicated to the World's Most Important Resource™

Sample Door Hanger: Before Lead Service Line Replacement

The following is model text for a door hanger that can be distributed just prior to utility main replacement or rehabilitation.

{Utility Logo}

48-Hour Notice

{Utility Name} is replacing the water main on your block. This work may affect your property on [INSERT DATE].

☐ This work will temporarily affect your water service starting at [INSERT TIME] am/pm for approximately [INSERT TIME] hours.

☐ We will be working in public space, but depending on the location of the property line, we may need to dig in your yard.

☐ We will be replacing or reconnecting the pipe on the public space. We will then need to flush your water service pipes. Please open the valve to your outside faucet and make sure the outside faucet is available to us.

☐ Other [INSERT OTHER DETAILS]

For more information, please contact:

{Utility Name}'s Contractor: [CONTACT INFORMATION]

{Utility Name} Project Manager: [PROJECT MANAGER'S NAME]

24-Hour Customer Service Line: [CUSTOMER SERVICE LINE NUMBER]

{UTILITY WEBSITE}
Sampling Protocol for Drinking Water in Schools

A Guidance Document for Drinking Water Testing

Emailed to more than 5,500 Schools on February 16, 2017
SB-550 – SCHEDULE - SCHOOLS

Schools constructed prior to 1/1/1987 complete sampling by 12/31/2017

Schools constructed after 1/1/1987 through 1/1/2000, complete sampling by 12/31/18

Schools constructed after 1/1/2000 no testing required (pending)
SB-550- SCHOOLS- SAMPLING

Sampling protocol shall consist of 2 consecutive samples

The first 250 ml sample shall be a first draw sample. Water must sit for minimum of 8 hours and maximum of 18 hours.

Second sample is 250 ml 30 seconds after the first. Allow water to run entire time between 1st and 2nd sample.
TO: School Districts and Chief School Administrators
FROM: Illinois Department of Public Health, Division of Environmental Health
DATE: February 24, 2017
SUBJECT: Requesting a school water testing waiver

DETAILS AT: IDPH WEB SITE

If multiple faucets use the same drain, only 1 second-draw sample must be taken
Schools - TESTING AND NOTIFICATION OF RESULTS

- **TESTING AND NOTIFICATION OF RESULTS**
  - Schools must use an IEPA accredited drinking water laboratory
  - Water must sit a Min. of 8 hrs. and a Max. of 18 hours
  - Schools must provide IDPH with sample results within 7 days of receipt of sample results
Schools - TESTING AND NOTIFICATION OF RESULTS

DO NOT SAMPLE ON SUMMER BREAK!!

TESTING AND NOTIFICATION OF RESULTS

Schools must provide IDPH with sample results within 7 days of receipt of sample results.

Schools must use an IEPA accredited drinking water laboratory.

Water must sit a Min. of 8 hrs. and a Max. of 18 hours.
Schools - TESTING AND NOTIFICATION OF RESULTS

Testing and Notification of Results

- Schools must provide IDPH with sample results within 7 days of receipt of sample results.
- Schools must use an IEPA accredited drinking water laboratory.
- Water must sit a Min. of 8 hrs. and a Max. of 18 hours.

DO NOT PRE-FLUSH PRIOR TO SAMPLING!
SCHOOLS - TESTING AND NOTIFICATION OF RESULTS

NOTIFICATION OF RESULTS

If sample results less than 5 ppb:
**GENERAL NOTIFICATION REQUIRED**
Schools shall use school website at a minimum to notify parents of results

If sample result exceed 5 ppb of lead:
**DIRECT NOTIFICATION REQUIRED**
School must notify all parents
DIRECT NOTIFICATION REQUIREMENTS

If sample result exceed 5 ppb of lead, school must notify all parents of students.

Location of sample tap exceeding 5 ppb and test result at the location.

Hazards of lead in drinking water (USEPA website).

Ways to mitigate risk.
Licensed Day Care Centers; Day Care Homes and Group Day Care Homes

Homes (Day Care, etc.) constructed prior to January 1, 2000 that serves children under 6 years old

On or before January 1, 2018 DCFS shall adopt rules that detail procedures and standards

After adoption these rules will become part of the license renewal application process
HOW WATER UTILITIES SHOULD HELP SCHOOLS

• Provide list of IEPA Drinking water accredited labs
  • Refer to IDPH web site, as necessary
• Provide assistance on proper sampling techniques
• Provide assistance with sampling plan
• Assist with sample letter notifying parents of results
• Speak with school board/parents
• Provide assistance in developing a water management plan
• Provide websites for:
  • educational materials for schools and parents
  • How lead gets into drinking water
ISAWWA

As water providers this is the time to regain public confidence

1. We are Professionals & Water Experts
2. Our #1 priority is public health
3. WE CAN MAKE A DIFFERENCE

COMMUNICATION IS THE KEY!
SCHOOLS & WATER PROVIDERS

PARTNERING FOR SAFE, CLEAN DRINKING WATER. IT’S NOT OUR JOB, IT’S OUR RESPONSIBILITY
REFERENCES

• Illinois Department of Public Health (IDPH) web site
  • http://www.dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water

• Illinois Section AWWA (ISAWWA) web site
  http://www.isawwa.org

• USEPA Web site
  • https://www.epa.gov/lead/learn-about-lead

• IEPA web site
  • http://www.epa.illinois.gov/highlights/resources-on-lead

• Centers for Disease Control web site
  • https://www.cdc.gov/nceh/lead/leadinwater/
ISAWWA – SB-550 - LEAD & COPPER

QUESTIONS?

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