



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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BRUCE RAUNER, GOVERNOR

LISA BONNETT, DIRECTOR

March 31, 2016

Mr. Joel Beauvais
Deputy Assistant Administrator, Office of Water
U.S. EPA
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Dear Deputy Assistant Administrator Beauvais:

The Illinois Environmental Protection Agency and the Illinois Department of Public Health share U.S. EPA's commitment to the protection of public health and safety of Illinois' drinking water supplies.

In response to U.S. EPA Region 5's letter dated February 29, 2016, the Illinois Environmental Protection Agency and the Illinois Department of Public Health confirm the State is fully implementing U.S. EPA guidance, protocols, and procedures under the Lead and Copper Rule (LCR).

Both Agencies utilize EPA guidance documents on LCR sampling and procedures for optimizing corrosion control. The Illinois EPA has developed a chapter in our Sample Collector Handbook (SCH) which details LCR requirements and LCR implementation, including sampling protocols and guidance for identification of Tier 1 sampling sites. Illinois EPA correspondence to water system operators includes and/or references SCH applicable chapters, appendices and forms.

The SCH is posted on the Illinois EPA website and is made available to water system personnel and the public. The Illinois EPA and DPH use the public facing SDWIS information system, known as Drinking Water Watch, to make sample results available to the public and water system personnel, along with information regarding violations, enforcement actions, inventory and contacts. The Illinois EPA and DPH rarely find the need to invalidate sample results, however if necessary, a record of the transaction and the basis for the invalidation is maintained in both electronic and paper form.

While Illinois is fully implementing the LCR, the Illinois EPA and DPH are working together to identify enhancements to public health protection as the LCR is being implemented. Specifically, we are conducting regular meetings to strengthen our coordination efforts in order to share data that will allow us to better evaluate the contribution of potable water to blood lead levels.

To further strengthen our efforts related to the LCR, the Illinois EPA will require water system follow-up on all individual user results above 15 ug/L within 10 days of data receipt, so that

occupants are advised promptly about steps they can take to reduce their lead exposure. Water systems will be required to educate individual users about the benefits of replacing lead service lines and premise plumbing that contains lead, especially if high lead results occur repeatedly at the same address.

Illinois EPA will provide water supplies with revised sampling instructions and consumer education materials, including changes in instructions related to flushing practices (no pre-flushing) and advice to reduce lead exposure included.

Illinois EPA will require water systems to re-evaluate their monitoring site plans and to certify that the locations represent the "worst case" risk for lead leaching. The Illinois EPA will also require water systems to review the status of the plumbing connections to their distribution systems with respect to the categories under the LCR and to update and refine their inventories of lead service lines. In addition, Illinois EPA is developing an audit strategy of existing community water supply monitoring locations to verify that proper monitoring protocols are being followed.

The Illinois DPH conducts a thorough review of sample results at Non-Transient Non-Community Public Water Supplies with special emphasis on schools and daycare centers. The Illinois DPH has initiated a review of its site selection criteria and sampling protocol. Upon completion of this review, Illinois DPH will develop and disseminate standard sampling and site selection documents to private laboratories that provide sample kits for lead and copper testing. These documents are based on the recent recommendations from U.S. EPA and Illinois EPA. Illinois DPH will also include these documents in a quarterly sample schedule letter that is sent to all Non-Transient Non-Community Public Water Supplies. These revisions will ensure that sample site locations represent the highest level of health protection based on the criteria of human consumption and "worst case" risk for lead leaching.

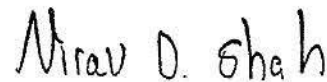
The Illinois EPA and DPH look forward to our continued partnership with the U.S. EPA in improving and sustaining the drinking water systems in Illinois. We share the desire to ensure that an adequate sustained investment is made in innovative programs to protect and improve Illinois' aging drinking water infrastructure.

Sincerely,



Lisa Bonnett
Director, Illinois EPA

Sincerely,



Nirav Shah, M.D., J.D.
Director, Illinois DPH

cc: ✓ Peter Grevatt
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