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MEMORANDUM

**TO:** Thomas J. Weiss  
Manager, Division of Labs  
Illinois Environmental Protection Agency

**FROM:** Justin DeWitt, P.E., LEED AP  
Chief of General Engineering

**DATE:** February 28, 2017

**SUBJECT:** Public Act 099-0922 Lead In Water Testing

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In accordance with Public Act 99-0922, the Plumbing Licensing Law (225 ILCS 320/35.5) was amended by adding Section 35.5. Schools in Illinois are now required to submit test results for water samples analyzed by Illinois Environmental Protection Agency (IEPA) laboratories, accredited to perform testing for lead in drinking water. Further, Section 35.5 requires that schools report test results to the Illinois Department of Public Health (IDPH) and to parents and guardians of students. When any individual sample test result exceeds 5 parts per billion (ppb), schools are required to provide individual notification to parents and guardians.

To ensure consistency and reliability in Illinois' school lead in water data, and to ensure schools produce data that complies with the Law, IDPH requires the following:

1. IEPA-accredited laboratories processing samples for schools in compliance with Section 35.5 must analyze those samples by an IEPA-approved method which provides a minimum reporting limit (MRL) of 2.00 ppb. Any data submitted by a chief school administrator that was analyzed by an IEPA-approved method with a MRL greater than 2.00 ppb will be rejected. The MRL must be clearly stated in the analytical report. IDPH reserves the right to establish a minimum MRL requirement at its discretion.
2. Results are to be reported with three significant digits and units of ppb or micrograms per liter ( $\mu\text{g/L}$ ). For example, 5.12 ppb.
3. Laboratories must not provide statements on reports which indicate compliance with unrelated state or federal standards or guidelines, such as the federal Primary Drinking Water Standards, federal Lead and Copper Rule, and 3T's. These standards are not pertinent to the samples being analyzed.
4. The analytical report must clearly state the volume of the sample collected. Section 35.5 requires schools to obtain 250 mL of water. Results for any other volume of water will be rejected.
5. Lab reports shall indicate the **Time Last Used** for the sampled plumbing system to verify that sampling comported with the mandated stagnation period of 8 to 18 hours.

IDPH appreciates your support of these requirements as the accrediting authority. Should you have any questions, please consult the resources below and feel free to contact the IDPH Plumbing and Water Quality Program.

ADDITIONAL RESOURCES

IDPH Lead in Water website: <http://dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water>

Public Act 099-0922 - <http://www.ilga.gov/legislation/publicacts/99/099-0922.htm>

Plumbing Licensing Law - <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1343&ChapterID=24>

Plumbing Code - <http://www.ilga.gov/commission/jcar/admincode/077/07700890sections.html>

ISAWWA School Sampling Guidance - <http://dph.illinois.gov/sites/default/files/publications/sampling-drinking-water-guidance-021617.pdf>