

Lead Service Line Replacement Advisory Board Meeting Minutes - April 10, 2024

Webex Webinar or In-person at Illinois EPA Headquarters

The Lead Service Line Replacement Advisory Board (Board) was called to order at approximately 2:00 p.m. Jeff Guy took a roll call of Board members present:

Joey Logan-Pugh, Acting Chief, Bureau of Water, Illinois EPA (present)
Africa, Associate Director, Illinois Department of Revenue (present)
Jason Bauer, Assistant City Engineer, City of Aurora (present)
Anna-Lisa Castle, Policy Director, Clean Water & Equity, Alliance for the Great Lakes (absent)
Dave Clark, Acting Public Works Director, City of Champaign (present)
Brad Cole, Executive Director, Illinois Municipal League (present)
Brian Cox, Plumbing and Water Quality Program Manager, Illinois Department of Public Health (present)
Briana Parker, Associate Director, Elevate Energy (absent)
Joseph Healy, Business Manager, LiUNA Local 1092 (present)
Paul Hinterlong, Councilman, City of Naperville (present)
Darrell King, Water Production Bureau Chief, City of Evanston (present)
Todd LaFountain, Water Division Manager, City of Springfield, City Water, Light and Power (absent)
Brent O'Neill, Director of Engineering, Illinois American Water (present)
Rick Powers, Director of Public Works, City of Peoria (absent)
Brian Rader, Public Works Superintendent, Village of Caseyville (present)
Jones Richmond, Business Representative, Plumbers Local 130 (present)
Jamie Rott, Water Superintendent, City of Rockford (present)
Brenda Santoyo, Little Village Environmental Justice Organization (present)
Patrick Schwer, Director of Water Quality Surveillance, City of Chicago (present)
Iyana Simba, Illinois Environmental Council (present)
Tom Somers, Director of Public Works, City of Herrin (absent)
Allison Swisher, Department of Public Utilities, City of Joliet (absent)
Ann Taylor, Mayor, City of Waukegan (present)
Mike Pubentz, Interim Water Director, City of Elgin (absent)
Nora Bertram, Senior Engineer, City of Elgin (present)
Justin Williams, Metropolitan Planning Council (absent)

Others attending (in-person):

Jeff Guy, Illinois EPA Office of Community Relations (moderator)
Brad Frost, Illinois EPA Office of Community Relations
Gary Bingenheimer, Illinois EPA Financial Assistance
Mike Brown, Illinois EPA Bureau of Water
Adam Nutt, Illinois EPA Bureau of Water
Nidhan Singh, Illinois EPA Bureau of Water

Jeff Guy took a roll call of Board members present. He reminded Board members that the Board shall meet no less than once every sixth months, and the second required Board meeting for 2024 is October 9, 2024.

Summary of Discussion

Adam Nutt summarized the federal Lead and Copper Rule Revisions (LCRR); compliance and enforcement will begin in October 2024. It clarifies that a “small system” is any system with a population of 10,000 or lower. It adds a lead trigger level and a lead action level. Lead action level exceedances will now have stricter corrosion control treatment in place. The LCRR will also be adding “find and fix” requirements for individual sample sites over the lead action level, as well as school and childcare facility testing requirements.

Adam Nutt also described two ways that a system could be required to replace lead service lines prior to April 15, 2027: 17.12 (gg) and 17.12 (ff). According to 17.12 (gg), watermain replacements must replace all lead service lines before they are connected to the new water main. 17.12 (ff) states that in the event of an emergency repair, the lead sections of the service line must be replaced.

Adam Nutt discussed the LCRR guidelines for replacement: systems with a population over 10,000 with a 90th percentile over 10 parts per billion (PPB) must conduct goal-based lead service line replacement at a rate set by the Illinois EPA, systems with a population over 10,000 with a 90th percentile over 15 PPB must conduct lead service line replacement at a rate of 3% over a two-year rolling average, and systems with a population of 10,000 or under with a 90th percentile over 15 PPB must conduct a lead service line replacement if that is the option selected under the small systems compliance flexibility options after a small system exceeds the action level.

Justin Williams asked for clarification on the relationship between the LCRR and state legislation, as the LCRR presents a different timeline. Adam Nutt stated that the state law, 17.12, is working toward the plans that start the replacement in 2027. After 2027, the state law will require every system with lead service lines to meet a replacement rate.

Darrell King requested further information about submitting post-replacement lead testing. Adam Nutt stated that there will be three months to do a follow-up test after the line is replaced, as well as a point-of-use filter with six months of replacement cartridges. Darrell King asked for guidance on a situation with no response with respect to a request to replace lead service lines. For the follow-up sample after replacement, Adam Nutt said that no further action can be taken if they do not follow-up.

Patrick Schwer asked if the Illinois EPA would utilize the existing 17.12 goals as the baseline for replacing lead service lines that exceed the trigger level in 2024 and 2025. Adam Nutt clarified that the Illinois EPA and the system would have to work together to decide on a rate, and that this rate would be a case-by-case basis.

Adam Nutt gave an update on the previous year’s inventory; there was a total of 1,420 portal submissions and 1,450 template submissions. 100 systems did not submit their inventory. These systems were redirected to the Illinois Rule Water Association for assistance. This year, 356 inventories and 67 replacement plans were submitted. Justin Williams asked if they should expect communities to submit plans in the near future, and Adam Nutt was optimistic about receiving more plans than the previous year.

Brad Cole asked if there was any feedback from the General Assembly on the report. Neither the Office of Community Relations nor the Bureau of Water received feedback.

Patrick Schwer requested clarification on Illinois EPA enforcement on the LCRR rule about meter replacements. He provided an example of causing a disturbance on a line, and asked how strictly Illinois EPA will interpret the rule for this situation. Adam Nutt responded that water shutoffs or meter replacements for lead service lines would require a filter to be distributed.

There were no public comments, and the meeting was adjourned at 2:30 p.m.

The meeting recording and other pertinent documents are available on the Illinois EPA [Lead Service Line Replacement Act Advisory Board webpage](#).