

Lead Testing, Reporting, and Mitigation

Required Steps

There are two sets of requirements. Senate Bill 550 has the basic requirements. However, the Illinois Department of Public Health, has additional requirements. For example, Senate Bill 550 does not require mitigation, but assumes school will do so in response to being informed school has detectable lead in water. IDPH goes beyond that and requires mitigation for any detectable lead.

Step One: Do Testing - If you have completed testing, move to step 2. If not, follow instructions:

Schools that provide education for children P-K to 5 and were built before 1987 are required to test by 12/31/17. Schools built between 1987 and 2000 have until 12/31/18.

Suburban Laboratories, Inc., has worked with some Lutheran schools with success. Contacts are Pat Rodriguez Project Manager, 708-544-3260 ext 214, pat@suburbanlabs.com and Dan Galeher, Dan@suburbanlabs.com 708 544 3260 x216

School is to determine the number of fixtures to be sampled. All plumbing fixtures that are used for cooking or drinking must be sampled. Bathroom and utility sinks do not have to be sampled. However, many bathroom sinks are being “voluntarily” tested due to students filling their portable water bottles with that source. Although not required, it is suggested that you include bathroom sinks.

School is to contact Suburban Labs to obtain enough 250 mL sample bottles, chain of custody forms, and instructions to collect 2 samples from each fixture. This means you need two bottles per fixture.

Step Two: Submit Results to Illinois Department of Health

Within seven business days of receipt, test results are to be submitted by email to IDPH at ph.LeadH2O@illinois.gov. If testing was done by Suburban labs, check to see if they would submit your results

Step Three: Inform Parents - Please copy of notices to CLEF.

How fast do you have to do this? Illinois Department of Health (IDPH) suggests that you inform parents as soon as you receive results. “If you can inform us within seven days, you can inform parents within seven days. However, the law simply says you must inform parents, but is silent on how fast. If you have received results and not yet informed parents, you are in the clear, but need to inform them ASAP.

If any of the samples taken in the school exceed 5 ppb (parts per billion), you must provide individual notification, via written or electronic communication, to the parents or legal guardians of all enrolled students. You must include the location(s) within the school building where lead was found, the ppb for each location, and the following

website:

<http://www.dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water>

If all of the samples taken were below 5 parts per billion, you may inform parents by posting on the school's web site or by sending individual notices. This is to be done even if no lead is detected as parents need to know that you are doing what is required. Also include the following website:

<http://www.dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water>

You are not required to report location and ppb of lead detected that is less than 5 ppb. However, even if less than 5ppb, the IDPH strongly encourages you to include the locations within the school building where lead was found and the ppb. Full disclosure is the best policy.

Sample notices are available upon request.

You are required to do mitigation for any detectable lead. However, you are not required to announce the details of the mitigation plan in this first notice. It will take time to thoughtfully develop and you will announce as soon as developed.

Step Four: Remove any problem fixtures from service.

The IDPH does not give specific ppb instructions on this. If the lead level is low and you are taking steps to mitigate such as flushing regularly, you would likely not consider this a problem fixture. If the lead level is not low, install signs, remove handles, or bag the device to prevent use until the problem can be addressed. The IDPH is not willing to give a ppb number for what is low and what is not low. Suggest that when in doubt, remove from service.

Step Five: Create and Implement Mitigation Plan - Inform parents of the specifics of your plan.

IDPH requires mitigation for any location where lead is detected whether above or below 5 ppb. Two samples are required for each location. If lead is detected in either sample, the location is considered to have detectable lead.

How do you create a mitigation plan?

1. The IDPH Mitigation Strategies for Lead Found in School Drinking Water provides some suggestions. You may google to find a template copy.
 - Some suggestions are relatively simple. For example:
 - Locate the fixtures farthest from the entry point of the water service to the building and flush them for 10 minutes each morning.
 - Open all fixtures used for cooking and drinking and run until you feel the water temperature get colder.

FLUSHING IS ALWAYS GOOD. NO MATTER WHETHER LED IS DETECTABLE OR NOT, IT IMPROVES THE QUALITY OF THE WATER SUPPLY.

2. If you need additional assistance, you may wish to contact Mike Hermann of Weber Group Management, 773 283 8121, 773 391-0721, mdherman@sbcglobal.net. Mike is a former Luther High School North teacher.
3. Suburban labs has suggested two other possibilities
 - Nick Malone, P.E.Environmental Services, Inc. (ESI) Office: 708.354.7121 Cell: 708.712.7140
 - David J. Kedrowski, Weaver Consultant GroupO: 312-922-1030 | F: 312-922-0201 | M: 630-640-9681 www.wcgrp.com<<http://www.wcgrp.com>>
dkedrowi@wcgrp.com<<mailto:dkedrowi@wcgrp.com>>
Environmental Services is a smaller lab. Fees would be negotiated between the school and the lab with payment the responsibility of the school.

Step Six: Retest to determine whether or not your mitigation plan has been successful

The only way you can determine whether or not your mitigation has been successful is to retest following the same procedures as for the original tests.

Although it is not a legal requirement, you are strongly encouraged to retest and to submit results to the IDPH. The Freedom of Information Act allows anyone (media, parent, etc.) to contact the IDPH and receive full information about the content of lead in water in your school. If you had lead and IDPH has documentation that problem was corrected, you are on safe ground.

Contacts for Additional Information:

1. Contact the IDPH. Contacts given are highly knowledgeable and have been extremely helpful:
Brittany McGovern, 217 582 5830, Brittany.mcGovern@illinois.gov
Aaron Martin, 217 582 5830, Aaron Martin: aaron.martin@illinois.gov