



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/785-0561

December 15, 2022

Eric Weiss
City of Elgin
150 Dexter Court
Elgin, IL 60120

Re: IL0894380, ELGIN -- Lead Action Level Exceedance

Water System Official:

After a final review of your lead and copper sampling for the July through December 2022 monitoring period, it appears your system has exceeded the lead action level. The lead 90th percentile value for the period has been calculated to be 0.0227 mg/l. This 90th percentile value is greater than the lead action level of 0.015 mg/l.

The following page details a list of requirements you must now complete.

The Lead and Copper Rule requirements are detailed in the "*Sample Collectors Handbook, Chapter 4 Lead and Copper Rule*". It is strongly recommended that you read this Chapter now so that you fully understand what will be expected over the next year. This document can be viewed and/or downloaded at:

<https://www2.illinois.gov/epa/topics/compliance-enforcement/drinking-water/Pages/sample-collectors-handbook.aspx>

Failure to comply with all requirements is a violation of State and federal law and may result in enforcement action. If you believe that our records are incorrect or have any questions concerning this matter, please contact me at the above telephone number.

Sincerely,

Adam Nutt
Compliance Assurance Section
Division of Public Water Supplies
Bureau of Water

cc: David Kaptain

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
2009 Mall Street Collinsville, IL 62234 (618) 346-5120
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IL0894380, ELGIN

Action Level Events & Compliance Schedule

Because your water supply exceeded the lead action level, you will be required to complete the events listed below by the specified date. In addition to these requirements, a reference to the Sample Collector's Handbook Chapter 4 - Lead and Copper Rule (SCHB) will be listed as a source of additional information. If you have questions, please contact the Lead and Copper Coordinator at 217-785-0561.

- 1) You must continue collecting water quality samples from the distribution system.
- 2) You must continue collecting water quality samples from each entry point into the distribution system from TP02.
- 3) You must collect a lead/copper source water sample from each entry point into the distribution system.
- 4) You must collect 100 lead/copper samples every six months, until two consecutive rounds of monitoring are below the action levels.

Event	Due Date	SCHB Reference
Distribute Public Education (PE) Program for Lead	<i>60 days from End of Monitoring Period</i> March 1, 2023	Page 11 & Appendix H
Submit PE Certification Form with PE copy	Immediately after Distribution to Customers	Page 11 & Appendix H
Public Education (PE) is essentially a public educational notification that must be delivered to all your consumers. The PE program fully explains all aspects of lead in drinking water. This is a comprehensive program with many requirements. You will need to read and fully understand SCHB Appendix H to deliver a satisfactory PE program. Delivery of your PE to the public must be made by the date listed above. You are again required to submit a copy of your PE program along with the Illinois EPA PE Certification Form immediately after your program is delivered to the public. All Illinois EPA reporting forms and example templates can be found in Appendix H. PE must be repeated as long as the lead action level is exceeded.		

Event	Due Date	SCHB Reference
Submit Source Water Treatment Recommendation	<i>6 months from End of Monitoring Period</i> June 30, 2023	Page 7 & Appendix D
Source Water Sample Collection	<i>60 days from End of Monitoring Period</i> March 1, 2023	
All supplies, including those that purchase water from another CWS, must collect at least one source water (entry point to the distribution system) sample per treatment plant AND recommend source water treatment to the Illinois EPA based from the results of the source water sample(s). Appendix D contains a source water treatment recommendation template that may be used by the water system to make their recommendation.		

Event	Due Date	SCHB Reference
Submit Optimal Corrosion Control Treatment (OCCT) Recommendation	July 30, 2023	Page 8 & Appendix E
Water Quality Distribution and Entry Point Sample Collection	March 1, 2023	
<p>OCCT is the primary mechanism for reducing lead and copper levels. Water systems that exceed an Action Level must submit a recommendation describing what they intend to do to reduce lead and/or copper levels. All lead/copper and water quality data must be evaluated. Appendix E contains an OCCT template that may be used by the water system to make their OCCT recommendation.</p>		

Event	Due Date	SCHB Reference
Install Optimal Corrosion Control Treatment (OCCT) after Illinois EPA Approval	24 months after Illinois EPA Approval of OCCT	Page 8 & Appendix F
<p>Once your OCCT recommendation is approved by the Illinois EPA, OCCT must be installed and properly operating within 24 months of the Illinois EPA approval date. Before the end of the 24-month deadline, the system must submit an OCCT Verification Form (located in Appendix F) to the Illinois EPA. This form certifies that OCCT has been installed and is being properly operated.</p>		

Event	Due Date	SCHB Reference
Complete Follow-up Monitoring after Installation of OCCT	12 months after installation of OCCT	Page 8
<p>The CWS must collect two consecutive six-month monitoring rounds of lead/copper and water quality samples post OCCT installation. These two monitoring periods are termed follow-up monitoring. The frequency and number of samples required will depend on the population served, source of water, and the type of OCCT. The Illinois EPA will send notification of these requirements once the OCCT Verification Form is received from the CWS. Follow-up monitoring verifies the relationship between water quality parameters and levels of lead and copper in drinking water as specified by the OCCT Recommendation. After follow-up monitoring, the Illinois EPA will set specific WQP ranges for the CWS.</p>		

Event	Due Date	SCHB Reference
Lead Service Line Removal	<i>12 months after end of monitoring period on which action level was exceeded</i> December 31, 2023	Page 13 & Appendix E
<p>Lead service line replacement (LSLR) is intended as an additional step to reduce lead exposure when corrosion control treatment is unsuccessful. You must begin replacing lead service lines if you continue to exceed the lead action level after installing corrosion control treatment and/or source water treatment.</p>		

Event	Due Date	SCHB Reference
Resume Collection of Entry Point and Distribution Water Quality Samples (WQP)	Immediately	Page 9 & Appendix G
Submit Water Quality Parameter (WQP) Ranges Certification of Results Form	January 10th & July 10 th	Page 9 & Appendix G
<p>The purpose of measuring water quality parameters (WQP) is to determine whether or not a system is operating optimal corrosion control treatment (OCCT) at a level that most effectively minimizes the lead and copper concentrations at consumers' faucets. For water systems serving less than 50,000, measuring WQP is only required if the action level is exceeded. WQP monitoring may stop once the Action Level is subsequently met.</p>		

This is your reminder letter for the required sampling mentioned in the above letter. It is the responsibility of each water facility to notify the laboratory concerning bottles for the required Source Water sample, water quality entry point samples and the water quality distribution samples.