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Frequently Asked Questions: New Lead in Water Testing and Mitigation Requirements for Child Care Facilities in Illinois

Q. What is the testing deadline for the new lead in water rules?

A: If your home or facility was built on or before January 1, 2000, and you serve children birth to six years of age, you must complete lead in water testing by May 1, 2019. We encourage all providers to conduct testing as soon as possible to ensure children have safe drinking water.

Q. How long do we have to mitigate if lead is found at or above 2.01 parts per billion (ppb) at one of our drinking water outlets?

A: Mitigation plans must be submitted to DCFS within 120 days of receiving results indicating lead at or above 2.01 ppb. However, you must take immediate steps to ensure children have a safe drinking water supply while you develop and implement a mitigation plan.

Q. What if I tested my water before the rules were finalized? Do I need to test again?

A: Read the final rules to make sure that the testing and subsequent actions you took are in compliance with the final rule. If so, you do not need to test again. DCFS will accept test results, no matter how old, as long as all requirements were met (i.e. all required outlets were tested, two samples were taken, etc.)

Q. How frequently are we expected to conduct lead testing? How long are results valid?

A: If you find lead in any of your samples at 2.01 ppb or above, you will need to develop a mitigation plan and collect follow up samples within six months AND within 1 year after implementing your plan. If both of your follow up tests reveal lead levels below 2.01 ppb, then you only need to conduct follow up testing in the event there is a change to your building's water profile. Your water profile may change if you replace your water heater, replace the water service line connected to your facility or change your water source.

Q. How soon do providers need to get samples to the lab after collecting them?

A: IEPA or IPEA approved labs must chemically preserve your samples within 14 days, so it is important to send or deliver your water samples to the lab as soon as possible (ideally, on the same day). Also, be sure to ask your lab if they have any special instructions for sending or delivering your water samples.

Q. What water sources do we need to test under the new rules?

A: According to the new rules, lead in water testing will need to occur at water sources that are used for “drinking or food preparation for day care operations.” This likely includes your kitchen and bathroom faucets, refrigerator dispensers and automatic ice machines, and drinking fountains and bubblers. If children drink from other sources in your building such as hoses or bathtubs, test those sources as well.

Q. Our child care is located in a larger facility with other rooms that are *not used* by our child care program. Do we need to test these areas?

A: The new rules only require you to test **water sources used for drinking or food preparation for day care operations**. Therefore, you do not need to test areas of your building that are unused by your child care program.

Q. Where can we find the list of companies that are certified to conduct lead testing? What certifications should they have?

A: Under the new rules, you will need to use an IEPA laboratory or an IEPA approved lab to process your water samples. You can find a list of approved labs on the DCFS Sunshine website [here](#). Not all approved labs are located in Illinois.

Q. As a child care provider, am I able to collect lead in water samples on my own? Or does someone need to come out to my facility to collect the samples?

A: You are able to conduct lead in water testing on your own as long as you use an IEPA lab or IEPA approved lab to process your samples. To learn more about how to test your water for lead, watch this [short video](#) or view [this webinar](#) on the lead in water sampling process. Your IEPA or IEPA approved lab will also send you specific sampling instructions and sampling bottles.

Q. How can we determine where the source of lead is?

A: Source water from the treatment plant rarely contains lead. However, lead can get into water from corrosion of leaded plumbing. Sources of lead in water include lead service lines, brass fixtures containing lead, and lead solder connecting internal copper piping.

The first step in determining the source of lead is to investigate for the presence of a lead service line. To do so, contact your water utility who may have records. Another option is to conduct a visual inspection by checking the service line as it enters the building either on your own or with assistance from a licensed plumber (see [NPR's interactive web-based tool](#) for guidance on visually inspecting for a lead service line).

Next, the water samples you collect will help you identify if lead is present in your facility's internal plumbing system.

- If there is lead in the first draw sample but not the 30 second flush, then the lead is most likely coming from a fixture like a sink faucet or a drinking fountain.
- If there is lead in the 30 second flush sample, then the situation is more complicated, as the lead is likely coming from a source further upstream in the internal plumbing system (e.g., lead solder, internal lead piping). In this case, read [EPA's 3Ts guidance](#) for reducing lead in drinking water and contact your water utility for additional guidance.

Q. What mitigation strategies do you recommend for child care facilities? How do we know when to use a certain strategy?

A: The most effective methods include removing the source of lead (i.e., remove the lead service line, replace brass fixtures containing lead). There are also a variety of effective interim strategies, including flushing at the tap or installing [point of use NSF 53 certified filters](#). Watch [webinars 3 and 4](#) for more detail or review the immediate, interim, and permanent mitigation option tables at the end of this FAQ sheet. Also see [EPA's 3Ts guidance](#) for additional information on mitigation strategies.

Q. Can we use bottled water or filtered water as a mitigation strategy?

A: Use of bottled water or a water delivery program as a mitigation strategy will need to be approved by DCFS. Installing [NSF 53 certified filter\(s\)](#) can be used as an interim mitigation strategy until a permanent mitigation strategy can be employed. Some facilities may also choose to use NSF 53 certified filter(s) as a permanent control measure; if you use this approach, be sure to create a maintenance schedule and identify a point of contact to be in charge of making sure the filters are properly maintained or replaced.

Q. When does it make sense to use manual flushing as a mitigation strategy? How long do we flush the water at the start of the day?

A: Manual flushing is an interim strategy that can be employed while developing a permanent solution. There are two types of manual flushing, which should be utilized under different scenarios:

- If the lead is coming from a faucet or fountain (i.e., lead detected in first draw sample but not in 30 second flush sample), flush at the tap for 30 seconds at the beginning of the day as well as 5 seconds before each use (installing signage can help institute this practice).
- Whole system flushing can be used if there is a lead service line present or if there is a widespread contamination issue from several fixtures or internal plumbing sources. Conduct a whole system flush at the beginning of the day by running the faucet furthest away from the service line on each floor that is NOT used for drinking water for 10 minutes. Next, let the water run at all drinking water fountains without refrigeration for 30 seconds to 1 minute. After that, flush your drinking water fountains with refrigeration for 30 seconds to 1 minute. Finally, run the kitchen faucets for 30 seconds to 1 minute, making sure the water is cold. For more detail, watch [this webinar](#) or check out [EPA's factsheet on flushing](#).

Q. How do you mitigate at a drinking water fountain?

A: Removing the lead source is always the best strategy, when possible. However, drinking water fountains (especially water coolers) can be expensive to replace. One effective way to reduce lead levels at a drinking water fountain is to install an automatic/mechanical flushing device, which will automatically flush water at pre-determined times to reduce lead levels. You can [speak with a professional](#) for more details on the feasibility of this mitigation strategy for your facility. Also note that since this strategy does not remove the source of lead, you would likely want to retest lead levels every 5 years.

Q. What are some every day, best practices my facility can follow to reduce lead in water?

A: There are many best practices child care facilities should consider adding to standard building operating procedures to help reduce lead at water taps. While these should not be used in lieu of a permanent mitigation plan, you should consider following these routine practices to help reduce lead exposure. These include:

- Avoid using hot water for cooking or drinking.
- Avoid using hose bibs (outdoors or at utility sinks) for drinking.
- Clean your faucet aerators (the removable screen located at the tip of your faucet) to remove built-up sediment and debris. Soaking the aerator in vinegar can help dissolve and remove particulate lead.
- Flush fixtures for 30 seconds at the beginning of the day and 5 seconds before each use to reduce lead levels.
- Follow the manufacturer’s instructions for routine flushing of the hot water heater.

Immediate, Interim, and Permanent Mitigation Options for Child Care Facilities

Immediate Mitigation Actions

Action	Situation	Pro	Con
Shut off problem outlet/s	If any sample is > 10 ppb	+No cost solution +Easy to implement	-Need to find another drinking water source
Install Signage: <i>“Do not drink water”</i>	The 30 second flush sample is between 2.01 ppb and 10 ppb AND the first draw sample is < 10 ppb	+Low cost/no cost +Easy to implement	-Requires a behavior change -Temporary solution -Need to find another drinking water source
Install Signage: <i>“Run water for 5 seconds before use”</i>	The first draw sample is between 2.01 ppb and 10 ppb AND your 30 second flush sample is < 2.01 ppb	+Low cost/no cost +Easy to implement	-Requires a behavior change -Temporary solution
Notice to parents and staff	After receiving test results and after implementing mitigation actions	+Builds trust +Provides important public health info.	*Required

Interim Mitigation Actions

Action	Situation	Pro	Con
Point of Use Filters	Always helpful, especially if the 30-second flush sample is 2.01 ppb or greater	+Ensures lead levels are low	-Must be maintained -Cost -Some types may require plumber assistance to install
Manual Flushing: <ul style="list-style-type: none"> • Step 1: Flush for 30 seconds at the beginning of the day • Step 2: Flush for 5 seconds before each use 	If the 30-second flush sample is less than 2.01 ppb (i.e., lead source is fixture)	+Low cost/no cost +Easy to implement	-Requires a behavior change -Temporary solution
Whole System Flushing	<ul style="list-style-type: none"> • LSL is present • If several 30-second flush samples are at 2.01 ppb or greater (i.e., widespread problem/unknown sources) 	+Low cost/no cost +Can be implemented immediately	-Lead levels may increase over day -Time intensive -Wastes water
Bottled Water	Use in extenuating circumstances (i.e., issues at many faucets/outlets in the building)	+Ensures lead levels are low	-Cost and waste -Subject to Department approval

Permanent Mitigation Actions

Action	Situation	Pro	Con
Lead Service Line Replacement	If utility records and/or visual inspection reveal a LSL	+Removes largest contributor of lead in water	-May be cost prohibitive
Replace faucet or drinking fountain	Prioritize if first draw is > 10 ppb and the 30 second flush sample is less than 2.01 ppb	+Long term solution to address lead source	-Lead levels may increase temporarily post replacement -Upstream fitting or valve may be lead source -Larger upfront cost



Automatic mechanical flushing	Good option if you have multiple problem outlets or replacement is cost prohibitive (e.g., drinking water fountain)	+Reduces lead levels automatically	-Larger upfront cost -Need to retest periodically -Wastes water
Water bottle filling station with filter	Good option if you have multiple problem outlets	+Easy way to access drinking water +Avoid use of filters at multiple faucets	-Requires regular maintenance (filter replacement) -Cost