

LEAD UPDATE

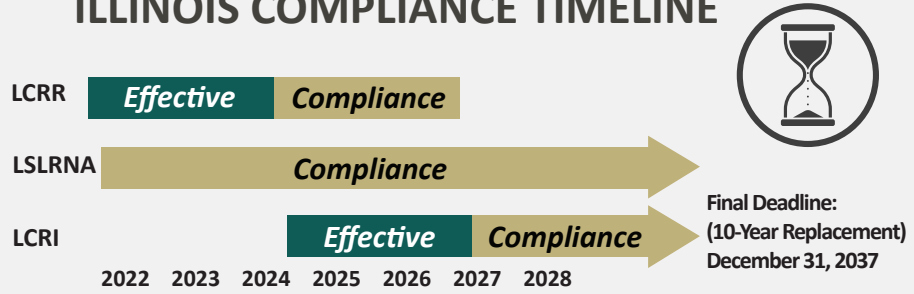
Lead and Copper Rule Improvements (LCRI)

The Illinois Lead Service Line Replacement and Notification Act (LSLRNA) has been in effect since January 1, 2022. The Illinois Pollution Control Board (IPCB) adopted LCRI “as issued by USEPA” on January 22, 2026. This action did not repeal the Illinois Lead Service Line Replacement and Notification Act (ILSLRNA); therefore, municipalities will be required to meet both ILSLRNA and the federal Lead and Copper Rule Improvements (LCRI) starting November 1, 2027.

KEY CHANGES

Key Changes	LCRR	LCRI
1. Mandatory Full Lead Service Line Replacement (with Timeline)	<ul style="list-style-type: none"> Mandatory LSLR Only if CWS has a Lead Trigger or Action Level Exceedance 	<ul style="list-style-type: none"> Requires Full Replacement of all Lead and GRR Service Lines Establishes 10-Year Replacement Timeline with Annual Targets Strong Limitations on Partial Replacements
2. Lower Lead Action Level (15 ppb→10 ppb) and Elimination of Trigger Level	<ul style="list-style-type: none"> 15 ppb Action Level + 10 ppb “Trigger Level” 	<ul style="list-style-type: none"> Reduces Action Level to 10 ppb Eliminates Trigger Level Entirely
3. More Stringent Tap Sampling Protocols	<ul style="list-style-type: none"> Focused on 5th-Liter Sampling at High-Risk Sites 	<ul style="list-style-type: none"> Requires Both 1st-Liter and 5th-Liter Sampling Uses the Higher Value for Compliance
4. Expanded and More Detailed Service Line Inventory Requirements	<ul style="list-style-type: none"> Required Initial Lead Service Line Inventory (LSLI) Public Availability Required 	<ul style="list-style-type: none"> Requires a Baseline Inventory Including Connectors Must Include Address-Level Detail Requires: Annual Updates; Validation of Non-Lead Lines; and Identification/Removal of Unknowns Over Time
5. Non-Lead Material Inventory Validation Required (All Systems)	<ul style="list-style-type: none"> No Requirement to Visually Validate Non-Lead Services in Material Inventory 	<ul style="list-style-type: none"> All Systems Must Conduct 2-Points of Visual Validation Along a Designated Number of Service Based on the System’s Validation Pool Deadline = November 2034
6. Enhanced Public Communication and Consumer Protection Requirements	<ul style="list-style-type: none"> Improved Notification Requirements (Annual Notices, 24-Hour Tier 1 Notice) Filters Required in Certain Conditions 	<ul style="list-style-type: none"> Further Strengthens Requirements: More Frequent and Transparent Communication; Faster Delivery of Sampling Results; Expanded Public Education on Health Risks

ILLINOIS COMPLIANCE TIMELINE



- December 16, 2021**
Effective Date for the Lead and Copper Rule Revisions (LCRR)
- October 16, 2024**
Compliance Date for Lead and Copper Rule Revisions (LCRR)
- January 22, 2026**
Lead and Copper Rule Improvements (LCRI) Adopted “as Issued by USEPA.” Municipalities Required to Meet Both ILSLRNA and LCRI
- November 1, 2027**
LCRI Compliance Date. LCRI will Supersede the LSLRNA for Some Requirements
- December 31, 2037**
10-Year Replacement Deadline



Link to EEI Lead & Copper Resources Webpage



For more information, please contact **Kristen Meehan PE** at kmeehan@eeiweb.com or (630) 466-6787

