



**Lead and Copper Rule Revision School
Lead Testing Requirements FAQs
Last Updated: June 2025**

Overview: The United States Environmental Protection Agency (EPA) passed a regulation called the Lead and Copper Rule Revision that went into effect Jan. 1, 2025. This regulation requires water utilities to educate the public about the potential dangers of lead in drinking water and requires testing in certain elementary schools and childcare facilities. The City of Naperville Water Utility will begin testing schools and childcare facilities in the summer of 2025.

1. What is the Lead and Copper Rule Revision?

The United States Environmental Protection Agency (EPA) passed a regulation called the Lead and Copper Rule Revision, which took effect this year and requires water utilities to conduct public outreach and lead testing in schools and childcare facilities. This regulation can be found in Illinois Administrative Code Title 35, Part 611.362.

2. Which facilities need to be tested for lead?

All elementary school and childcare facilities built before Jan. 1, 2014.

3. How do you define “elementary school?”

For this rule, an elementary school is defined as a school classified by state and local practice as elementary and comprising any span of grades (including pre-school) through eighth grade.

4. We’ve already tested for lead. Why do we have to do it again?

Your facility may have been required to do lead testing under Illinois law. The Lead and Copper Rule Revision is a federal regulation that requires water utilities *across the country* to test for lead in schools and childcare facilities.

If you have previous lead testing results from testing required by the State of Illinois, please contact Lisa McNames at McNamesL@Naperville.IL.US with those sample reports. The



City of Naperville Water Utility Department may be able to seek a waiver from the Illinois EPA for this testing.

5. How many samples need to be collected?

Five samples per school need to be collected. The samples must be taken from outlets used for public consumption at outlets typically used for consumption. This includes two drinking fountains, one kitchen faucet used to prepare food or drink, one classroom faucet or another faucet used for drinking, and one nurse's office faucet (if available). If any of these are not applicable, a sample will be collected from another outlet used for consumption.

6. How are the samples collected?

Samples must be collected in 250 milliliter containers from cold water taps after the water has sat stationary in the building's plumbing system for at least eight hours, but not more than 18 hours prior to sampling. Bottles and sampling instructions will be provided by the City.

7. Who collects the samples?

An appropriately trained official of the facility may collect the samples. Assistance is always available from the City's Water Utility as needed.

8. Who is paying for the lead testing?

The City's Water Utility will pay for this lead testing and facilitate all coordination with the certified laboratory doing the analysis.

9. When does this testing need to be complete?

The City's Water Utility is required to sample 20% of the elementary schools and 20% of the childcare facilities we serve each year, for five years, until they have all been tested.

Samples need to be collected by the end of the proposed calendar year. If your school is one of the facilities that will be tested, the City's Water Utility will reach out to schedule specific testing dates.

10. When will we get the test results?

The City's Water Utility will provide results to the facility as soon as practicable, but no later than 30 days after receiving the samples.



11. What happens if lead is detected?

The City's Water Utility will work with school administrators to identify the source of lead and provide information to remedy the situation. Follow-up testing can be requested after remediation.

12. What about Naperville high schools?

Secondary schools are not required to participate in this program, but may request sampling. This can be done by contacting Lisa McNames at (630) 420-6121 or McNamesL@Naperville.IL.US.

13. What should we be doing right now?

Start identifying the appropriate sampling faucets at each school based on the criteria included in this FAQ sheet. A Water Utility staff member can also conduct an on-site visit to help identify the required outlets.

14. Who should I contact if I have questions?

Lisa McNames is the Regulatory Compliance Manager for the Naperville Water Utility and is administering this program. She can be reached at (630)420-6121 or McNamesL@Naperville.IL.US.