

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
AMENDMENTS TO PRIMARY DRINKING) R15-23
WATER STANDARDS) (Rulemaking - Water)
35 ILL. ADM. CODE 611)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have electronically filed today with the Illinois Pollution Control Board Illinois EPA's TESTIMONY OF W. DAVID MCMILLAN for the above captioned rulemaking, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

DATED: July 1, 2015

1021 N. Grand Ave. East
P.O. Box 19276
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(217) 782-5544

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
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TESTIMONY OF W. DAVID MCMILLAN

My name is Dave McMillan. I began my current role as Illinois' Drinking Water Administrator in December of 2010. In this position, I have led a collaborative program of four sections staffed by environmental engineers, geologists and specialists. The Permit, Compliance Assurance, Groundwater and Field Operations Sections ensure the safety of the Illinois' drinking water supplies. Together the staff of the Division of Public Water Supplies oversees allocation of resources to conduct inspections, evaluate source water protection programs, issue permits and ensure the safety and compliance of community water systems.

My advancement to Manager of the Division of Public Water Supplies began in 1985 when I graduated from Bradley University, with a Bachelor of Science Degree in Geology. I began my career in a Field Office of the Illinois EPA in the newly formed Groundwater Section. I worked my way through the ranks and eventually took on a Unit Manager role in 1992 and moved into the Central Office in Springfield. In 2004, I became the interim Manager of the Field Operations Section of the Division of Public Water Supplies, a position that later became permanent. My curriculum vita is attached as Exhibit 1.

Today I would like to address the need to update Illinois' regulations for community public water supplies with respect to the addition of fluoride to drinking water.

On May 1, 2015, the United States Department of Health and Human Services issued its recommendation that community water supplies that add fluoride to their water to maintain the fluoride ion concentration of 0.7 mg/l. The Illinois Pollution Control Board's ("Board") current regulations require community water supplies that add fluoride to maintain a fluoride ion concentration between 0.9 and 1.2 mg/l. Section 7a of the Public Water Supply Regulation Act provides that the Illinois Department of Public Health ("IDPH") shall adopt rules to provide for the addition of fluoride to public water supplies, and such rules shall incorporate the recommendations on optimal fluoridation adopted by the United States Department of Health and Human Services, 415 ILCS 40/7a (2104). At this time, the Illinois EPA believes the Board should modify the regulations administered by the Illinois EPA.

Further, in my view, the Board should do everything in its power to shorten the regulatory process with respect to revising the fluoride standard. I base this view on the information I have received from community water supplies in Illinois. Specifically, the Illinois EPA projects water systems that add fluoride could see a reduction of 20% to 30% in the cost of their chemical addition for fluoride. The Illinois EPA projects that a total population using water with fluoride addition is 11,825,891 according to information gleaned from the Safe Drinking Water Information System. Based upon information received from the City of Chicago and considering their population served is 5,409,202, they estimate a savings of \$1,000,000 per year. Again, based upon information received from Illinois American Water Company and considering their population served is 932,688, they estimate a savings of \$150,000 per year. If we extrapolate these two estimates, the cost savings statewide can be conservatively projected to around \$2,000,000 statewide per year (Extrapolation #1, $11,825,891/5,409,202 * \$1,000,000 = \$2,186,254$ and Extrapolation #2, $11,825,891/932,688 * \$150,000 = \$1,901,904$). Obviously,

during these times of limited resources, these funds could go a long way to adding further protection to water supplies in Illinois.

III. Conclusion

I thank the Board for allowing me to file testimony in this matter. I will supplement the testimony as needed during the hearing, and I am happy to address any questions.

Respectfully submitted,

By: /s/ W. David McMillan
W. David McMillan, P.G.
Manager, Division of Public
Water Supplies

DATED: June 30, 2015

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(217) 782-5544

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Date: 04/10/2015

CURRICULUM VITAE OF WILLIAM D. MCMILLAN, P.G.

I. Education and Professional Registration

- 2014 to Present U.S. EPA Region 5 Association of State Drinking Water Administrators Board Representative
- 1998 to Present Illinois Professional Geologist Licensure (License No. 196-000255)
- 1986 to Present Continuing Education: Illinois Central College-Water Plant Operations & Environmental Law course work. Miscellaneous state and federal short courses and seminars: including supervisory level training in DHS National Incident Management System, CMS Interview Training, 40 hour OSHA Safety Training and CPR/First Aid Training.
- 1981 to 1985 Bachelor of Science in Geological Sciences-Bradley University
- 1984 Field Mapping course completed with Texas Tech University

II. Summary of Experience

Approximately twenty-nine years of experience working as a professional geologist in hydrogeology/environmental geology at the Illinois Environmental Protection Agency. Interdisciplinary experience with progressive responsibility as manager of the Division of Public Water Supplies (DPWS), the Field Operations Section- DPWS and the Planning and Assessment Unit of the Groundwater Section- DPWS.

III. Chronological Experience

- 12/10 to Present **MANAGER DIVISION OF PUBLIC WATER SUPPLIES**
Manage four sections staffed by environmental engineers, geologists and specialists who ensure the safety of the Illinois' drinking water supplies. Oversee allocation of resources to conduct inspections, evaluate source water protection programs, issue permits and ensure safety and compliance of community water systems.
- 9/05 to 12/10 **MANAGER FIELD OPERATIONS SECTION**
Manage six field offices staffed by environmental engineers and specialists who ensure the safety of the Illinois' drinking water supplies. Oversee allocation of resources to conduct operational visits, engineering evaluations, response to emergencies, investigation of consumer complaints, provision of technical assistance to water supply officials, inspection of State Revolving Fund loan projects, and other special investigations.

Specifically, establish the frequency and content of evaluations of community water supply facilities to ensure that safety and adequacy of Illinois' drinking water. Coordinate with the Illinois Emergency Management Agency and Illinois EPA Office of Chemical Safety during community water supply service interruptions resulting emergencies/disasters. Coordinate with the Illinois EPA Division of Legal Council and Office of the Attorney General to ensure community water supply compliance with state law and Illinois Pollution Control Board regulations. Coordinate with other Illinois EPA managerial staff regarding multi-jurisdictional issues and resolutions.

2/04 to 9/05

ACTING MANAGER FIELD OPERATIONS SECTION

Temporarily Manage the Division of Public Water Supplies' Field Operations Section. This interim position provided oversight to six field offices as previously described.

10/98 to 2/04

MANAGER OF THE PLANNING AND ASSESSMENT UNIT

Manage a diverse professional and technical staff. Coordinate and provide administrative support of scientific studies or projects pertaining to groundwater/source water protection. Gather and analyze data to effectively manage groundwater monitoring, inspections, assessment efforts and special technical studies. Address and confer with diverse groups within the regulated community and public to assist in the preparation of concise written and verbal reports and prioritize groundwater protection implementation efforts. Perform short and long term information management/planning in conjunction with knowledge of hydrogeology and watershed hydrology. Act on behalf of the Groundwater Section manager in his/her absence and assist in making policy decisions. Provide technical and administrative support to other Illinois EPA Units and Sections, as well as, U.S. Environmental Protection Agency staff which directly and indirectly relate to the implementation of groundwater protection programs.

9/92 to 10/98

SUPERVISOR OF THE PLANNING AND ASSESSMENT UNIT

Supervise professional and technical staff engaged in groundwater monitoring, inspections, assessment efforts and special technical studies. Provide coordination and design of data management efforts. Consult with professional staff on complex groundwater assessment related activities. Coordinate inter and intra-Agency activities involving the assessment and planning related activities of the groundwater program. Oversee implementation of assessments under groundwater rules and regulations. Additionally, provide assistance and support to the Groundwater Section manager on specialized programmatic issues.

9/89 to 9/92

ENVIRONMENTAL PROTECTION SPECIALIST III.

Assisted in developing more complex functions and acted as a lead worker for graduate student interns and statewide field staff involved in routine and special monitoring; conducted legislative mandated well site surveys and reports; developed, reviewed and revised field procedures; assisted in conducting training seminars and workshops; assigned work - based on individual subordinate abilities and helped evaluate work performance. Assisted in coordination and acted as a local contact for the Central Illinois Groundwater Protection Planning Committee meetings.

11/87 to 9/89

ENVIRONMENTAL PROTECTION SPECIALIST II.

Assisted in monitoring program coordination, development and implementation by field staff. Act as lead worker for field staff and intern; related to staff new/revised responsibilities; evaluated field procedures, prepared reports; completed U.S. Environmental Protection Agency's National Pesticide Study. Assisted Section Manager in design and implementation of monitoring and surveying programs and conducted water quality monitoring in the Peoria Region.

11/86 to 11/87

ENVIRONMENTAL PROTECTION SPECIALIST I.

Conducted water quality monitoring of groundwater wells in the Peoria Region - including specialized field testing; maintained equipment, logs, field journals, QC records. Submitted accurate and timely monitoring/inspection forms, written records, and sampling records. Analyzed scientific data, conducted special intensive groundwater surveys. Attended and participated in meetings conferences, etc., performed all other duties as assigned.

11/85 TO 11/86

LIFE SCIENCE CAREER TRAINEE

Under direct supervision, learned to conduct field monitoring of wells, operated test equipment and transported samples to the laboratory; learned to independently conduct well monitoring, QC, etc., in a timely and effective manner; learned field office reporting procedures, logs, record keeping, requisitions and conduct necessary to accomplish goals; learned equipment calibration and maintenance; participated in design and operation of routine and special studies.

CERTIFICATE OF SERVICE

Joanne M. Olson, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING; and TESTIMONY OF W. DAVID MCMILLAN upon persons listed on the Service List by mailing, unless otherwise noted on the Service List, a true copy thereof in an envelope duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois on July 1, 2015.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
Division of Legal Counsel

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