

BEFORE THE POLLUTION CONTROL BOARD  
OF THE STATE OF ILLINOIS

IN THE MATTER OF:	)	
	)	
PUBLIC WATER SUPPLIES:	)	
PROPOSED NEW 35 ILL. ADM.	)	R18-17
CODE 604 AND AMENDMENTS	)	(Rulemaking – Water)
TO 35 ILL. ADM. CODE PARTS	)	
601, 602, 607, AND 611	)	

NOTICE OF FILING

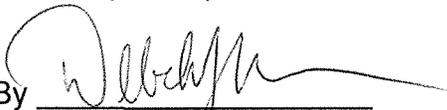
To: John T. Therriault, Clerk  
Tim Fox, Hearing Officer  
Illinois Pollution Control Board  
100 West Randolph  
Suite 11-500  
Chicago, IL 60601

And Attached Service List

Please take notice that on October 2, 2017, I filed electronically with the Office of the Clerk of the Illinois Pollution Control Board the attached **Appearance of Deborah J. Williams** and **Pre-Filed Questions of the City of Springfield, Office of Public Utilities d/b/a City Water, Light and Power**, a copy of which is attached and served upon you.

Respectfully submitted,

THE CITY OF SPRINGFIELD,  
a municipal corporation

By   
\_\_\_\_\_  
One of its Attorneys

Dated: October 2, 2017

Deborah J. Williams  
Regulatory Affairs Director  
Office of Public Utilities  
800 East Monroe  
Springfield, Illinois 62701

(217) 789-2116

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IN THE MATTER OF:

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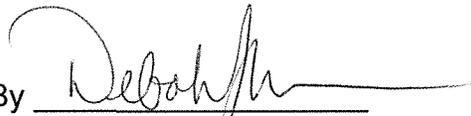
R18-17  
(Rulemaking – Water)

APPEARANCE OF DEBORAH J. WILLIAMS

The undersigned, as one of its attorneys, hereby enters her appearance on behalf of the City of Springfield, Office of Public Utilities d/b/a City Water, Light and Power (CWLP).

Respectfully submitted,

THE CITY OF SPRINGFIELD,  
a municipal corporation

By   
One of its Attorneys

Dated: October 2, 2017

Deborah J. Williams (ARDC #6244123)  
Regulatory Affairs Director  
Office of Public Utilities  
800 East Monroe  
Springfield, Illinois 62757  
Email: [deborah.williams@cwlp.com](mailto:deborah.williams@cwlp.com)

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Electronic Filing: Received, Clerk's Office 10/2/2017

- b. Explain the technical basis for this change to the minimum combined chlorine residual requirement.
  - c. Provide a brief explanation for the record of where and how compliance with these new minimums will be determined?
  - d. How will these minimum chlorine residual requirements be enforced for community water supplies that purchase water?
2. For combined chlorine community water supply systems like CWLP, what public health improvements would be achieved by the proposed change?
  3. What consequences of raising the total chlorine residual requirement were considered in developing this proposal? What negative public health impacts from the proposed change were evaluated?
  4. What percentage of community water supplies do not currently meet the proposed minimum residuals requirements?
  5. What additional steps will need to be taken by the communities that do not currently meet this requirement?
    - a. What cost was assumed for this increased chemical usage?
    - b. What safety or environmental impacts of increased chemicals storage were considered?
    - c. What is the taste and odor impact of this change ?
  6. What evidence was relied on to determine the current standard is not protective?
  7. Will a community water supply be more likely to exceed the disinfection by-products requirements as a result of this proposal?
  8. What incremental increase in trihalomethane levels will occur as a result of this proposal?
  9. What other States' requirements were looked at in developing this Section of the proposed rule? Which States have this same requirement? Which States have different requirements?

10. Did the Agency study virus inactivation at plants complying with the current minimum chlorine residual requirements in developing the proposal? If so, what was found?
11. Mr. McMillan testifies that "Illinois EPA believes that the impact of this increase in disinfectant residual reflects the best practices already in place in most Illinois' water supplies." p. 5.
  - a. What residual data from existing water supplies was this statement based on?
  - b. What best practices is this statement referring to?

### **604.730 Continuous Chlorine Analyzers**

12. The proposed change contained in Section 604.730 states "Community water supplies that rely on chlorination for disinfection pursuant to Section 604.700(a) present in the source water must have continuous chlorine residual analyzers and other equipment that automatically shuts down the facility when chlorine residuals at the entry point to the distribution system are below the limits established in Section 604.725."
  - a. What does the phrase "present in the source water" mean in this sentence?
  - b. Would this provision require all surface water plants to have their chlorine analyzer shut-down water production if the analyzer residuals fall below the new minimum chlorine residual requirements of proposed Section 604.725?
  - c. Did the Agency consider the frequency or impacts of chlorine analyzer failures on the community water supply in developing this requirement?
  - d. Did the Agency consider the alternative technology of requiring an alarm with the requirement to manually check residual levels and determine a course of action as an alternative to automatic shut-down?
  - e. What is the cost of the automatic shut-down equipment required by this provision?

### **Section 604.1150 Fluoride**

13. Section 604.1150(a) of the proposal provides: "Basis of Design – Equipment shall have the capacity to maintain the fluoride content in the finished water at 0.7 mg/l."
  - a. Is this requirement technologically feasible?

- b. Is it physically or scientifically possible for any equipment to maintain a fluoride level of precisely 0.7 mg/l at all times?

14. Why did the Agency not propose a range of values as is found in 35 Ill. Adm. Code 653.701(b)?

**Section 604.1340 Elevated Storage**

15. Proposed Section 604.1340(a) provides that "The minimum storage capacity shall be equal to the average daily usage or be based on an engineering study of the distribution system hydraulic conditions, anticipated domestic water demands of the system, and where fire protection is provided, fire flow demands..."
  - a. Why did the Agency decide to require minimum storage capacity to be equivalent to average daily usage?
  - b. Is this provision found in Part 653 or the Recommended Standards?
16. How will this new requirement change the interpretation of what serves as an appropriate engineering study?
17. Will communities that do not currently have storage equivalent to their average daily usage be required to redo engineering studies as a result of this change?
18. How much do the engineering studies required in this Section cost?
19. How many community water supplies are expected to need additional storage as a result of this requirement? What additional storage costs were assumed in developing the rulemaking proposal?

20. How does a uniform requirement of storage “equal to average daily usage” for all size community water supply systems address the concern that “Excess storage capacity can cause deterioration of the finished water quality and must be avoided”? Statement of Reasons at p. 50.

Respectfully submitted,

THE CITY OF SPRINGFIELD,  
a municipal corporation

By   
One of its Attorneys

Dated: October 2, 2017

Deborah J. Williams  
Regulatory Affairs Director  
Office of Public Utilities  
800 East Monroe  
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Email: [deborah.williams@cwlp.com](mailto:deborah.williams@cwlp.com)

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CERTIFICATE OF SERVICE

The undersigned, Deborah J. Williams, an attorney, certifies that I have served upon the individuals named on the attached Service List a true and correct copy of the **NOTICE OF FILING, APPEARANCE OF DEBORAH J. WILLIAMS and PRE-FILED QUESTIONS OF THE CITY OF SPRINGFIELD, OFFICE OF PUBLIC UTILITIES d/b/a CITY WATER, LIGHT AND POWER**, by First Class Mail, postage prepaid, on October 2, 2017, from Springfield, Illinois unless indicated otherwise on the Service List. For service by e-mail, service from my email address ([deborah.williams@cwlp.com](mailto:deborah.williams@cwlp.com)) was made of this 9 page document before 5:00 p.m. on October 2, 2017 at the address provided on the attached Service List.



**SERVICE LIST R18-17**

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