JCAR
700 Stratton Building,
Springfield, IL 62706

Clerk's Office, Pollution Control Board
100 W. Randolph St., STE 11-500
Chicago, IL 60601

June 28, 2019

To the Pollution Control Board and Joint Committee on Administrative Rules,

On behalf of the signatory members of the municipal, construction, engineering, and concerned citizens in the state of Illinois, we humbly request that the Illinois Pollution Control Board (PCB) and Joint Committee on Administrative Rules (JCAR) eliminate an incorporated reference to Part 601 while also amending the proposed new Part 604 of Title 35, Subtitle F, Chapter I per the suggestions below:

Part 601 – Eliminate Incorporated Reference ASTM C76
ASTM C76-16 Standard Specification for Reinforced Concrete Culvert, Storm Drain, and Sewer Pipe, approved November 1, 2016.

Part 604.1440 (b)(1)(D)(iv) - Amend Lines 4760-4764
When the water main crosses a storm sewer, the storm sewer is constructed with materials conforming to latest revision of the Illinois Department of Transportation Standard Specifications for Road and Bridge Construction, Article 550, with joint performance that meets or exceeds ASTM C443 flat gasket joints or ASTM C361 "O-ring" joints within 10 feet of the water main.

The purpose behind these requested amendments is to improve the performance of storm sewer options allowed to cross water mains for the betterment of the general public. The current proposed rulemaking allows one of the least qualified materials as an option to be used by engineers when crossing a water main. Reinforced concrete pipe is a heavy material with the highest number of joints within 10 feet of a water main yielding a higher statistical chance of failure and interaction with the water main than other options available. Allowing all qualified options per the storm sewer specifications in the Illinois Department of Transportation Standard Specifications for Road and Bridge Construction would provide several more conservative water main crossing options with a maximum of one joint crossing the water main testable at an equal to higher pressure than ASTM C443 joints.

Additionally, by sole specifying a material for this application, the Illinois Pollution Control Board and Illinois General Assembly would be creating a monopolized market for storm sewer giving little flexibility to contractors or municipalities especially in emergency repair situations or key infrastructure projects.

After review, the general direction of the proposed rulemaking appears to be to allow materials to cross water mains with a minimum joint performance standard when used for storm sewer applications. The proposed rulemaking is an improvement to legacy rules requiring transitional materials on project sites which expose water supply systems to higher risk relying on couplings between water main quality materials and traditional storm sewer materials. Overall, we support the purpose of the rulemaking but simply ask that equally or more qualified sewer options be allowed for storm sewer crossings.

Lastly, attached is a list of signatory members and citizens of the State of Illinois that support the proposed language in this letter as a significant improvement for the new proposed Part 604 code.

Best Regards,

Bryan Miko, P.E.
Midwest Regional Engineer – Advanced Drainage Systems, Inc.
P: (630)945-7189 E:Bryan.miko@ads-pipe.com
Enclosure(s): Signatory Statements

JCAR
700 Stratton Building,
Springfield, IL 62706

Clerk's Office, Pollution Control Board
100 W. Randolph St., STE 11-500
Chicago, IL 60601

July 12, 2019

To the Pollution Control Board and Joint Committee on Administrative Rules,

After pursuing additional support from the engineering, municipal and construction community on amending the language in Part 604.1440(b)(1)(D)(iv), it was brought to my attention that the same exact language exists 30 lines down in Part 604.1440 (b)(2)(B)(iv) and would need to be adjusted appropriately as well. Therefore, I am providing this second letter as an add-on to the letter dated June 28, 2019.

Part 604.1440 (b)(2)(B)(iv) - Amend Lines 4790-4794
When the water main crosses a storm sewer, the storm sewer is constructed with materials conforming to latest revision of the Illinois Department of Transportation Standard Specifications for Road and Bridge Construction, Article 550, with joint performance that meets or exceeds ASTM C443 flat gasket joints or ASTM C361 "O-ring" joints within 10 feet of the water main.

The signed parties on the previous public comment would support equal, fair and consistent language be used by JCAR and the Illinois Pollution Control Board in new rules created around drinking water. The proposal offers the same solution as previously submitted, including allowing more qualified options for water main crossings, preventing monopolized specifications and meeting or exceeding currently specified joint performance. In addition, amending both sections would alleviate any potential confusion in the field for those performing and building the work by creating a consistent code to follow.

Best Regards,

Bryan Miko, P.E.
Midwest Regional Engineer – Advanced Drainage Systems, Inc.
P: (630)945-7189 E:Bryan.miko@ads-pipe.com
Enclosure(s): Signatory Statements

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____.
Signature

NOAH CARMICHAEL
Printed Name

FEHR GRAHAM
Organization, Company, Profession Information

515 LINCOLN HIGHWAY
Address Line 1

ROCHELLE, IL 61068
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Received, Clerk's Office 7/15/2019 P.C.#42

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____.
Signature

Michael Anderson
Printed Name

Haeger Engineering LLC
Organization, Company, Profession Information

100 E. State Parkway
Address Line 1

Schaumburg, IL 60173
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X W. Shane Larson
Signature

W. Shane Larson
Printed Name

Hutchison Engineering, Inc.
Organization, Company, Profession Information

2015 W. Glen Ave., Suite 210, Peoria, IL 61614
Address Line 1

Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X Thomas L. Huddleston III
Signature

THOMAS L. HUDDLESTON III
Printed Name

HUDDLESTON McBRIDE DRAINAGE CO.
Organization, Company, Profession Information

9504 FOWLER RD.
Address Line 1

ROCHELLE, IL. 61068
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

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Received, Clerk's Office 7/15/2019 P.C.#42

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

x Landon Kellenberger
Signature

Landon Kellenberger
Printed Name

Kellenberger Plumbing & Underground, Inc - Sitework Project Manager
Organization, Company, Profession Information

13N365 High Chapparal Elgin, IL
Address Line 1

Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X Jason T. Cox
Signature

Jason T. Cox
Printed Name

Len Cox & Sons Excavating
Organization, Company, Profession Information

1203 Theodore St
Address Line 1

Crest Hill, IL 60403
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____
Signature

TIMOTHY P. FARRELL
Printed Name

VILLAGE OF HUNTLEY, DIRECTOR OF PUBLIC WORKS & ENGINEERING
Organization, Company, Profession Information

10987 MAIN ST, HUNTLEY, IL 60142
Address Line 1

_____
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____.
Signature

JARED PLACEK
Printed Name

CIVIL ENGINEER, MANHARD CONSULTING, PROJECT MANAGER
Organization, Company, Profession Information

700 SPRINGER DRIVE
Address Line 1

LOMBARD, IL 60148
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____
Signature

Lonnie Avery
Printed Name

Performance Construction & Eng., LLC
Organization, Company, Profession Information

217 W. John Street
Address Line 1

Plano, IL 60545
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Received, Clerk's Office 7/15/2019 P.C.#42

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____.
Signature

GEORGE P. PAPADOPOULOS
Printed Name

PMB ENGINEERING, LLC
Organization, Company, Profession Information

10140 S. CREEK ROAD
Address Line 1

PALOS PARK, IL 60464
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

x Maureen R. Mulligan, P.E.
Signature

Maureen R. Mulligan, P.E.
Printed Name

RWG Engineering, LLC
Organization, Company, Profession Information

975 E. 22nd Street, Suite 400
Address Line 1

Wheaton, IL 60189
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

Signatory Statement to Amend Part 604.1440 (b)(1)(D)(iv) Lines 4760-4764

X _____
Signature

JASON GREEN
Printed Name

W.T GROUP, LLC
Organization, Company, Profession Information

2675 PRATUM AVE
Address Line 1

HOFFMAN ESTATES, IL 60192
Address Line 2

I hereby support the amended language to the proposed new Part 604 as provided in the letter dated June 28, 2019 as written and submitted by Bryan Miko, Midwest Regional Engineer for Advanced Drainage Systems.

3) Hydrant drains must not be connected to or located within 10 feet of sanitary sewers, storm sewers, or storm drains.

4) Hydrant drains must be above the seasonal groundwater table.

Section 604.1430 Air Relief Valves

a) Air relief valves must be installed at high points in water mains where air can accumulate.

b) Automatic air relief valves must not be used in situations where flooding of the manhole or chamber may occur.

c) Air Relief Valve Piping

1) The open end of an air relief pipe from a manually operated valve must extend to the top of the pit and be provided with a screened, downward-facing elbow if drainage is provided for the manhole.

2) The open end of an air relief pipe from automatic valves must be extended to at least one foot above grade and provided with a screened, downward-facing elbow.

3) Discharge piping from air relief valves must not connect directly to any storm drain, storm sewer, or sanitary sewer.

Section 604.1435 Valve, Meter and Blow Off Chambers

a) Valves, blow offs, meters or other such appurtenances to a distribution system must be protected from standing water in the chambers, pits or manholes.

b) Chambers, pits or manholes containing valves, blow offs, meters, or other appurtenances to a distribution system must be drained or be equipped with other means to remove standing water.

c) The chambers, pits and manholes containing valves, blow offs, meters, or other appurtenances to a distribution system must not connect directly to any storm drain or sanitary sewer.

Section 604.1440 Sanitary Separation for Finished Water Mains

Water mains must be protected from sanitary sewers, storm sewers, combined sewers, house sewer service connections and drains as follows:

a) Horizontal Separation

1) Water mains must be laid at least 10 feet horizontally from any existing or proposed drain, storm sewer, sanitary sewer, combined sewer or sewer service connection. The distance must be measured edge to edge.

2) Water mains may be laid closer than 10 feet to a sewer line when:

A) local conditions prevent a lateral separation of 10 feet;

B) the water main invert is at least 18 inches above the crown of the sewer; and

C) the water main is either in a separate trench or in the same trench on an undisturbed earth shelf located to one side of the sewer.

3) When it is impossible to meet subsection (a)(1) or (a)(2), the following requirements must be met:

A) Required Materials

i) Both the water main and drain or sewer must be constructed of materials specified in Section 604.1410; or

ii) The sewer has a structural lining meeting ASTM F1216. The Agency may approve an alternate structural lining under Section 604.145(b).

B) The drain or sewer must be pressure tested to the maximum expected surcharge head before backfilling.

4) Water mains must be laid at least 25 feet horizontally from any existing or proposed sanitary lift station, unless otherwise approved by the Agency under Section 604.145(b).

b) Vertical Separation

1) When possible, the water main must be placed above the sewer.

A) A water main must be laid so that its invert is 18 inches above the crown of the drain or sewer whenever water mains cross storm sewers, sanitary sewers, or sewer service connections.

B) The vertical separation must be maintained for that portion of the water main located within 10 feet horizontally of the outer edge of any sewer or drain crossed.

C) A length of water main pipe must be centered over the sewer to be crossed with joints equidistant from the sewer or drain.

D) When it is impossible to maintain the 18-inch separation specified in subsection (b)(1)(A), the Agency may approve an alternate construction method that reduces the risk of sanitary contamination, including:

i) Both the water main and sewer are constructed of water main materials specified in Section 604.1410, extending on each side of the crossing until at least 10 feet separates the two pipes;

ii) The sewer has a structural lining meeting ASTM F1216 or an alternate structural lining approved by the Agency under Section 604.145(b).

iii) The water main or the sewer is encased in a carrier pipe equivalent to water main materials specified in Section 604.1410, extending on each side of the crossing until at least 10 feet separate the two pipes; or

iv) When the water main crosses a storm sewer, the storm sewer is constructed with reinforced concrete pipe conforming to ASTM C76 with ASTM C443 flat gasket joints or ASTM C361 "O-ring" joints within 10 feet of the water main.

2) When it is impossible to place the water main above the storm sewers, sanitary sewers or sewer service connections, the water main may be placed below the sewer if:

A) The water main is laid so that it is at least 18 inches below the invert of the drain or sewer wherever water mains cross storm sewers, sanitary sewers or sewer service connections.

B) Construction

i) Both the water main and sewer are constructed of water main materials specified in Section 604.1410, extending on each side of the crossing until at least 10 feet separates the two pipes;

ii) The sewer has a structural lining meeting ASTM F1216 or an alternate structural lining approved by the Agency under Section 604.145(b);

iii) The water main or the sewer is encased in a carrier pipe equivalent to water main materials specified in Section 604.1410, extending on each side of the crossing until at least 10 feet separate the two pipes; or

iv) when the water main crosses a storm sewer, the storm sewer is constructed with reinforced concrete pipe conforming to ASTM C76 with ASTM C443 flat gasket joints or ASTM C361 "O-ring" joints within 10 feet of the water main.

C) The sewer or drain lines must be supported to prevent settling and breaking the water main.

c) Water mains must be separated from sewage disposal systems, disposal fields and seepage beds by a minimum of 25 feet.

d) Notwithstanding subsection (a) or (b), a sanitary sewer force main must have at least the following minimum separation:

1) When the sanitary sewer force main and the water main are parallel, a 10-foot horizontal separation from water mains; and

2) When the sanitary sewer force main and the water main cross, an 18-inch vertical separation, with the water main above the sanitary sewer force main.

Section 604.1445 Sanitary Separation for Raw Water Mains

a) Raw water mains from groundwater sources must have the same sanitary separation as provided in Section 604.1440 for finished water mains.