ILLINOIS POLLUTION CONTROL BOARD February 19, 2015

IN THE MATTER OF:)	
SDWA UPDATE, USEPA AMENDMENTS)	R15-6
(January 1, 2014 through June 30, 2014))	(Identical-in-Substance
)	Rulemaking - Public Water Supply)

Adopted Rule. Final Order.

OPINION OF THE BOARD (by J.A. Burke):

SUMMARY OF THIS ACTION

The Board today adopts amendments to the Illinois regulations that are "identical in substance" to drinking water regulations adopted by the United States Environmental Protection Agency (USEPA). The amendments involved in this docket incorporate into the Illinois drinking water regulation amendments in response to three USEPA actions that occurred during the first half of calendar year 2014. The Board further uses this opportunity to make a limited number of minor corrections to the existing text of various provisions.

The federal actions involved in this docket include the following: (1) the February 26, 2014 corrections to the Revised Total Coliform Rule (RTCR); and (2) the June 19, 2014 summary approval of alternative equivalent methods for drinking water monitoring, (3) which USEPA corrected on June 27, 2014.

Sections 7.2 and 17.5 of the Environmental Protection Act (Act) (415 ILCS 5/7.2 and 17.5 (2012)) provide for quick adoption by the Board of regulations that are identical in substance to federal regulations that USEPA adopts to implement Sections 1412(b), 1414(c), 1417(a), and 1445(a) of the federal Safe Drinking Water Act (SDWA) (42 U.S.C. §§ 300g-1(a), 300g-3(c), 300g-6(a), and 300j-4(a) (2011)). The USEPA National Primary Drinking Water Regulations (NPDWRs) implement Sections 1412(b), 1414(c), 1417(a), and 1445(a) of the federal SDWA (42 U.S.C. §§ 300g-1(a), 300g-3(c), 300g-6(a), and 300j-4(a) (2011)). The federal SDWA regulations are found at 40 C.F.R. 141 through 143. Section 17.5 also provides that Title VII of the Act and Section 5 of the Illinois Administrative Procedure Act (APA) (5 ILCS 100/5-35 and 5-40 (2012)) do not apply to the Board's adoption of identical-in-substance regulations.

This opinion supports an accompanying order adopted today. The Board will cause the adopted amendments to be filed with the Office of the Secretary of State, upon which they will become effective. A Notice of Adopted Amendments will then appear in the *Illinois Register*.

USEPA ACTIONS INCLUDED IN THIS DOCKET

USEPA Amendments During the Period January 1, 2013 Through June 30, 2013

The R14-8 docket includes two sets of amendments that USEPA adopted in the period January 1, 2014 through June 30, 2014, as follows:

February 26, 2014 (79 Fed. Reg. 10665)

<u>Description of the USEPA action</u>: USEPA adopted minor corrections to the Revised the Total Coliform Rule.

<u>Prospective necessary Board action in response</u>: The Board must incorporate the USEPA corrections are into the Illinois Primary Drinking Water Standards.

June 19, 2014 (79 Fed. Reg. 35801)

<u>Description of the USEPA action</u>: USEPA approved 21 alternative equivalent analytical methods for analyzing a variety of physical parameters and chemical and microbiological contaminants to demonstrate compliance with the drinking water standards.

<u>Prospective necessary Board action in response</u>: The Board must amend the corresponding segments of 35 Ill. Adm. Code 611 to add the newly approved alternative equivalent methods to appropriate segments of the Illinois drinking water regulations.

June 27, 2014 (79 Fed. Reg. 36428)

<u>Description of the USEPA action</u>: USEPA corrected errors in the June 19, 2014 summary approval of alternative equivalent methods.

<u>Prospective necessary Board action in response</u>: The Board must ensure that the corrections are incorporated into the June 21, 2013 approvals before the approvals are incorporated into the Illinois regulations.

Other Federal Actions Having a Direct Impact on the Illinois SDWA (Drinking Water) Regulations

In addition to the amendments to the federal wastewater pretreatment and SDWA regulations, amendments to certain other federal regulations occasionally have an effect on the Illinois drinking water rules. Most notably, 35 Ill. Adm. Code 611.102 includes the incorporation of a limited number of federal regulations by reference. These are the following federal regulations, including a brief description of each:

Federal Provision	
Incorporated by Reference	Subject Matter of the Incorporated Federal Provision
40 C.F.R. 3.2	Requirements for submission of required reports in an electronic format.
40 C.F.R. 3.3	Requirements for submission of required reports in an electronic format.
40 C.F.R. 3.10	Requirements for submission of required reports in an electronic format.

40 C.F.R. 3.2000	Requirements for submission of required reports in an electronic format.
40 C.F.R. 136.3(a)	Listing of analytical procedures approved for purposes of the federal Clean Water Act.
40 C.F.R. 136, Appendix B	A method for determination of a method detection limit for purposes of the federal Clean Water Act.
40 CFR 142.20(b)(1)	Describing the information the State must submit to USEPA to document any grant of relief from a federal National Primary Drinking Water Standard.

The 2014 edition of the *Code of Federal Regulations* is now available. For this reason, as a routine matter, the Board will use this opportunity to update all citations to the *Code of Federal Regulations* to the 2014 edition, removing any *Federal Register* citations that this action makes unnecessary.

PUBLIC COMMENTS

The Board adopted a proposal for public comment in this matter on November 6, 2014. A Notice of Proposed Amendments appeared in the November 21, 2014 issue of the *Illinois Register*, at 21 Ill. Reg. 21513, which started the 45-day public comment period. The Board expects to file any adopted rules with the Secretary of State no later than February 26, 2015, the statutory due date.

Before adoption of the November 6, 2014 proposal for public comment, the Board entered a single document as a public comment:

PC 1 Letter dated December 18, 2014 from James L. Sinclair, USEPA, OGWDW/TSC to Peter Gallant, Vice-President, Business Development and Regulatory Affairs, ENDETEC Sensor Group

By PC 1, USEPA explains that an analytical method dated May 22, 2014 is the method approved by USEPA. This in notwithstanding that the *Federal Register* recites that the approved version of the method was dated April 2014. See the discussion of Tecta EC/TC P-A Method below.

The Board received additional comments during the public comment period:

- PC 2 Letter dated July 24, 2014 from Thomas Poy, Chief, USEPA, Ground Water Drinking Water Branch to the Clerk of the Board (received December 19, 2014)
- PC 3 Comments of the Illinois Environmental Protection Agency (IEPA) dated December 31, 2014 from Joanne M. Olson, Assistant Counsel, IEPA, Division of Legal Counsel (received December 31, 2014)

By PC 2, USEPA submitted comments on the proposed amendments in this docket. The comments offered a series of corrections to segments of the rules. The corrections offered by

USEPA are listed in Table 4 at the end of this opinion, with attribution to USEPA of each correction made. USEPA further offered responses to questions posited by the Board in the proposal for public comment in the prior update docket, <u>SDWA Update</u>, <u>USEPA Amendments</u> (<u>January 31, 2013 through June 30, 2013</u>), R14-8 (Jan. 23, 2014). See the discussion of the USEPA comments on docket R14-8 below.

By PC 3, IEPA requested limited corrections to amendments adopted in two prior rulemakings. In support of one of its requested corrections, IEPA included comments submitted to IEPA by USEPA during the pendency of the present rulemaking. The corrections made in response to the IEPA comments are listed in Table 4 at the end of this opinion. See the discussion of the IEPA-requested corrections below.

The Board received one additional comment after the public comment period ended on January 5, 2015:

PC 4 E-mail exchange dated January 21, 2015 and January 27, 2015 between Johnathan C. Eastvold, Rules Analyst, JCAR, and Michael McCambridge, Board Hearing Officer

The Board hereby accepts PC 4 as though filed during the public comment peirod.

By PC 4, JCAR asked a series of questions that essentially offered corrections to the amendments as proposed. The JCAR questions, together with the Board's responses appear in the discussion of the JCAR questions below. The corrections made based on the JCAR questions are listed in Table 4 at the end of this opinion.

In addition to the public comments received, the Board received a document from JCAR that indicates several changes made by JCAR in preparing the text for *Illinois Register* publication. The Board reads the corrections indicated in this documents as JCAR suggestions for correction to the text. Table 4 at the end of this opinion indicates the several revisions made on final adoption that are based on JCAR suggestions. Table 5 indicates the JCAR suggestions that the Board has declined to follow. No discussion of these JCAR suggestions will appear in this opinion.

DISCUSSION

The first segment of discussion begins with a description of the amendments undertaken in direct response to the federal actions involved in this proceeding. This includes discussion of the Board's responses to the federal actions. This first segment of discussion summarily outlines the types of changes that the Board routinely makes when adapting USEPA text into Illinois rules. As is explained in this first segment of discussion, all changes to the literal text of the underlying federal amendments are itemized in tables towards the end of this document.

The second segment of discussion describes the various non-substantive amendments that are not directly derived from the federal action, but which the Board has included in this update docket as a routine, necessary matter, to ensure compliance with the substance of the federal regulations and the unique requirements of the Illinois regulatory system. The second segment broadly describes the miscellaneous amendments without detail. The discussion, however,

includes specific discussion of individual changes where the Board believes that more detail is warranted. As is explained below, all of the various amendments not directly derived from the federal action are itemized in a table towards the end of this document.

The third segment of discussion considers aspects of the comments received since the November 6, 2014 proposal for public comment. Three separate portions of discussion consider the comments from each of USEPA, IEPA, and JCAR.

Discussion of the Federal Actions

<u>Corrections to the Revised Total Coliforms Rule (RTCR)--Sections 611.1052, 611.1055, 611.1061, and 611.Appendix G</u>

By a direct final rule on February 26, 2014 (at 79 Fed. Reg. 10665), USEPA adopted corrections to the revised the total coliform rule. USEPA adopted the RCTR in 2013. *See* 78 Fed. Reg. 10270 (Feb. 13, 2013). The Board incorporated the RCTR into the Illinois drinking water rules in 2014. *See* SDWA Update, USEPA Amendments (January 1, 2013 through June 30, 2013), R14-8 (Nov. 7, 2013). The accompanying proposed rule appeared at 79 Fed. Reg. 10752 (Feb. 26, 2014).

USEPA described the minor corrections as relating to typographic errors in provisions relating to recordkeeping and state implementation requirements that could affect implementation and enforcement of the RTCR if not corrected. USEPA included other edits to the language of the RTCR intended to enhance understanding and avoid confusion. USEPA stated that the corrections and edits impose no new requirements.

The Board does not review the substance of a federal rule in the context of an identical-in-substance rulemaking proceeding. Any person interested in the substance of an identical-in-substance rule should refer to the *Federal Register* notice pertaining to the underlying federal requirement.

The Board incorporated the USEPA corrections into the Illinois drinking water regulations. None of the corrections warrants specific discussion in this opinion. The Board did not need to incorporate the USEPA revisions relating to state primacy into the Illinois rules because the federal provisions corrected have no counterparts in the Illinois rules.

Three tables appear at the end of this opinion. Table 1 lists the USEPA corrections that were not necessary in this rulemaking. Table 2 lists any deviations from the literal text of the corresponding USEPA corrections. Table 3 lists necessary corrections and revisions that were not directly based on the USEPA amendments involved in this proceeding.

<u>Request for Comments on the RTCR.</u> The Board requested comments on the incorporation of the federal corrections to the RTCR into the Illinois Primary Drinking Water Regulations in general. The Board did not receive comments on this aspect of the proposed amendments.

<u>Approvals of Alternative Equivalent Analytical Methods--Sections 611.102; 611.526; 611.531; 611.611; 611.612; 611.645; 611.720; 511.802; and 611.1052</u>

USEPA approved 21 alternative equivalent methods on June 19, 2014 (79 Fed. Reg. 35081). USEPA corrected the listing of approved methods on June 27, 2013 (79 Fed. Reg. 36428). The USEPA approval designated new methods as acceptable for use in demonstrating compliance with the NPDWRs. The methods were developed by voluntary consensus standards organizations and laboratory equipment vendors. USEPA used the expedited procedure of section 1401(1) of SDWA (42 U.S.C. § 300f(1) (2012)) for approval of the alternative equivalent methods. The newly approved methods are described as follows:

Alternative Equivalent Method Designation/Title	Contaminant/ Parameter	Regulation Federal/State
Standard Methods Online, Method 2550-10	temperature	141.23(k)(1)/ 611.611(a)(25)
Standard Methods Online, Method 3113 B-10 Metals by Electrothermal Atomic Absorption Spectrometry, Electrothermal Atomic Absorption Spectrometric Method (the same version is included in Standard Methods, 22nd edition)	antimony arsenic barium beryllium cadmium chromium copper iron lead manganese nickel selenium silver	141.23(k)(1)/ 611.611(a) (excluding aluminum, iron, manganese, silver, and zinc) 143.4(b)/ 611.612(f) (iron and manganese only)
Standard Methods Online, Method 5910 B-11 UV-Absorbing Organic Constituents, Ultraviolet Absorption Method	UV absorption at 254 nm	141.131(d)/ 611.381(d)
Standard Methods Online, Method 6251 B-07 Disinfection By-Products: Haloacetic Acids and Trichlorophenol, Micro Liquid-Liquid Extraction Gas Chromatographic Method	HAA5	141.131(b)(1)/ 611.381(b)(1)
Standard Methods Online, Method 6640 B-06 Acidic Herbicide Compounds, Micro Liquid- Liquid Extraction Gas Chromatographic Method	2,4-D 2,4,5-TP dalapon dinoseb pentachlorophenol picloram	141.24(e)(1)/ 611.645(b)

Standard Methods Online, Method 6651 B-05 Glyphosate Herbicide, Liquid Chromatographic Post-Column Fluorescence Method	glyphosate	141.24(e)(1)/ 611.645(b)
Standard Methods Online, Method 9215 B-04 Heterotrophic Plate Count, Pour Plate Method	heterotrophic bacteria	141.74(a)(1)/ 611.531(a)
Standard Methods Online, Method 9221 A-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, Introduction	total coliforms	141.21(f)(3)/ 611.526(c) 141.74(a)(1)/ 611.531(a)
Standard Methods Online, Method 9221 B-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, Standard Total Coliform Fermentation Technique	total coliforms	141.21(f)(3)/ 611.526(c) 141.74(a)(1)/ 611.531(a)
Standard Methods Online, Method 9221 B.1, B.2-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, Standard Total Coliform Fermentation Technique, 1. Samples & 2. Presumptive Phase	total coliforms	141.852(a)(5)/ 611.1052(a)(5)
Standard Methods Online, Method 9221 C-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, Estimation or Bacterial Density	total coliforms	141.74(a)(1)/ 611.531(a)
Standard Methods Online, Method 9221 E-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, Fecal Coliform Procedure	fecal coliforms	141.21(f)(5)/ 611.526(e) 141.74(a)(1)/ 611.531(a)
Standard Methods Online, Method 9221 F-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, <i>Escherichia coli</i> Procedure Using Fluorogenic Substrate	E. coli	141.402(c)(2)/ 611.802(c)(2)
Standard Methods Online, Method 9221 F.1-06 Multiple-Tube Fermentation Techniques for Members of the Coliform Group, <i>Escherichia coli</i> Procedure Using Fluorogenic Substrate, 1. <i>Escherichia coli</i> Test (EC-MUG Medium)	E. coli	141.852(a)(5)/ 611.1052(a)(5)
Standard Methods Online, Method 9222 D-06 Membrane Filter Technique for Members of the Coliform Group, Thermotolerant (Fecal) Coliform Membrane Filter Procedure	fecal coliforms	141.74(a)(1)/ 611.531(a)

Standard Methods Online, Method 9223 B-04 Enzyme Substrate Coliform Test, Enzyme Substrate Test	total coliforms <i>E. coli</i>	141.21(f)(3)/ 611.526(c) 141.21(f)(6)/ 611.526(f) 141.74(a)(1)/ 611.531(a) 141.402(c)(2)/ 611.802(c)(2) 141.852(a)(5)/ 611.1052(a)(5)
ASTM Method D512-12 B Standard Test Method for Chloride Ion in Water	chloride	143.4(b)/ None
ASTM Method D3223-12 B Standard Test Methods for Total Mercury in Water	mercury	141.23(k)(1)/ 611.611(a)
ASTM Method D4327-11 Standard Test Methods for Anions in Water by Suppressed Ion Chromatography	fluoride, nitrate, nitrite, orthophosphate, chloride, sulfate	141.23(k)(1)/ 611.611(a) 143.4(b)/ None
Colilert-18® Test Standard Methods, Method 9223 B using Colilert- 18® medium (from IDEXX Laboratories, Inc.)	E. coli	141.852(a)(5)/ 611.1052(a)(5)
Hach Method 10260 Determination of Chlorinated Oxidants (Free and Total) in Water Using Disposable Planar Reagent-filled Cuvettes and Mesofluic Channel Colorimetry (from Hach Company)	free chlorine total chlorine combined chlorine	141.74(a)(1)/ 611.531(b) 141.131(c)(1)/ 611.381(c)(1)
ChlordioX Plus Method Chlorine Dioxide and Chlorite in Drinking Water by Aperometry using Disposable Sensors (from Palintest Ltd.)	chlorine dioxide chlorite	141.74(a)(1)/ 611.531(b) 141.131(b)(1)/ 611.381(b)(1) 141.131(c)(1)/ 611.381(c)(1)
Tecta EC/TC P-A Test Presence/Absence Method for Simultaneous Detection of Total Coliforms and Escherichia coli (E.coli) in Drinking Water (from Veolia Water Solutions and Technologies)	total coliforms <i>E. coli</i>	141.21(f)(3)/ 611.526(c) 141.21(f)(6)/ 611.526(f) 141.402(c)(2)/ 611.802(c)(2) 141.852(a)(5)/ 611.1052(a)(5)

The Board updated the methods in the appropriate provisions of the Illinois drinking water regulations to add the several newly approved alternative equivalent methods. The Board has undertaken to incorporate the federal changes as near in substance as possible, but has found it necessary to deviate from the federal changes in some regards.

Structural differences exist between the federal regulations and their Illinois counterparts. These differences have required alteration of the way the information is presented. Despite these significant differences in structure, the Board does not intend any substantive differences between the USEPA-approved analytical methods and those set forth in the Illinois regulations.

The federal regulations list most of the approved analytical methods in a tabular format. Each tabular column corresponds with a method's source. The column headings and individual method entries include footnotes to indicate the full title and source of each listed method. *E.g.*, 40 C.F.R. 141.23(k)(1), 141.24(e)(1), and appendix A to subpart C of 40 C.F.R. 141 (2013) (corresponding with 35 Ill. Adm. Code 611.611(a) and 611.645). The Illinois rules deviate from this structure and presentation of methods in several ways.

Initially, the Illinois rules define a short-form reference name for each method, in 35 Ill. Adm. Code 611.102(a). The Illinois rules use this short-form reference name to refer to individual methods throughout the substantive requirements. *E.g.*, 35 Ill. Adm. Code 611.531, 611.611, and 611.645.

Second, the Illinois rules further deviate from the federal structure relative to analytical methods for inorganic chemical water quality parameters. The Board changed the federal tabulated listings of approved methods for parameters listed by USEPA to a standard regulatory paragraph format. *Compare* 40 C.F.R. 141.21(f)(3), 141.23(k)(1), 141.74(a), 141.131(b)(1) and (c)(1), 141.402(c)(2), and 141.852(a)(5) (2013) *with* 35 Ill. Adm. Code 611.526(c), 611.611(a), 611.531, 611.381(b)(1) and (c)(1), 611.802(c)(2), and 611.1052(a)(5) (respectively); *but see* 35 Ill. Adm. Code 611.645 (corresponding with 40 C.F.R. 141.24(e) (2013); retaining a tabular format).

Third, the Illinois rules incorporate analytical methods by reference in a different manner than has USEPA. The Illinois rules present a centralized listing of incorporations by reference in 35 Ill. Adm. Code 611.102. This incorporation by reference provision lists the approved methods by source. The Illinois rules further indicate where each method is used in the body of the substantive provisions.

Finally, the Illinois rules include all analytical methods that USEPA has approved for a single water quality parameter in a single place. USEPA has listed the methods that it has approved by rulemaking in the substantive monitoring requirements, in 40 C.F.R. 141.21(f)(3) and (f)(6); 141.23(k)(1); 141.24(e)(1); 141.74(a)(1) and (a)(2); 141.131(b)(1), (c)(1), and (c)(2); 141.132(b)(3)(ii)(B); 141.402(b); and 143.4(b) (corresponding with 35 Ill. Adm. Code 611.526(c) and (f); 611.611(a); 611.645, 611.531; 611.381(b)(1), (c)(1), and (c)(2); 611.382(b)(3)(B)(ii); 611.802(c); 611.1004; and 611.612(f), respectively). USEPA has listed the approved alternative equivalent methods separately from the methods approved by rulemaking, in appendix A to subpart C of 40 C.F.R 141.

The Board has set forth all alternative equivalent methods in the appropriate substantive provisions—together with the methods that USEPA approved by rulemaking. To distinguish the methods that USEPA approved by rulemaking from those that USEPA approved as alternative equivalent methods using the alternative summary procedure, the Board has added notes in the rules to indicate the methods that USEPA has approved using the expedited procedure.

Any person interested in the substance of the USEPA actions should review the *Federal Register* notice of June 19, 2014 and the correction of June 27, 2014. Three tables appear at the end of this opinion. USEPA amendments not necessary in this proceeding are listed in Table 1. The changes that the Board has found necessary to make in the text of the federal amendments (besides conversion of format) are indicated in Table 2. Table 3 lists necessary corrections and revisions that were not directly based on the USEPA amendments involved in this proceeding.

Omitted Citations to Standard Methods Online. The Board observes that all of the version of the methods that USEPA added from Standard Methods Online on June 19, 2014 also appear in the 22nd edition of *Standard Methods for the Examination of Water and Wastewater* (2012). The Board did not add the citations to methods available from Standard Methods Online because doing so would have been redundant. The Board omitted citations to the following from Standard Methods Online:

35 Ill. Adm. Code	Standard Methods	
Provision	Online Method	Analyte(s)
611.381(b)(1)(B)(i)	Method 6251 B-07	HAA5
611.381(d)(4)(B)	Method 5910 B-11	UV absorption at 254 nm
611.526(c)(1)	Method 9221 A and B-06	total coliforms
611.526(c)(4)	Method 9223 B-04	total coliforms
611.526(e)(3)	Method 9221 E-06	fecal coliforms
611.526(f)(11)	Method 9223 B-04	E. coli
611.531(a)(2)(A)(i)	Method 9221 A, B, and C-06	total coliforms
611.531(a)(2)(A)(iii)	Method 9223 B-04	total coliforms
611.531(a)(2)(B)(i)	Method 9221 E-06	fecal coliforms
611.531(a)(2)(B)(ii)	Method 9222 D-06	fecal coliforms
611.531(a)(2)(C)(i)	Method 9215 B-04	heterotrophic bacteria
611.611(a)(2)(D)(i)	Method 3113 B-10	antimony
611.611(a)(3)(C)(ii)	Method 3113 B-10	arsenic
611.611(a)(5)(D)(i)	Method 3113 B-10	barium
611.611(a)(6)(D)(ii)	Method 3113 B-10	beryllium
611.611(a)(7)(D)(i)	Method 3113 B-10	cadmium

611.611(a)(9)(D)(i)	Method 3113 B-10	chromium
611.611(a)(10)(A)(ii)	Method 3113 B-10	copper
611.611(a)(14)(A)(ii)	Method 3113 B-10	lead
611.611(a)(17)(E)(i)	Method 3113 B-10	nickel
611.611(a)(22)(D)(ii)	Method 3113 B-10	selenium
611.611(a)(25)	Method 2550-10	temperature
611.612(f)(2)(A)(ii)	Method 3113 B-10	iron
611.612(f)(3)(A)(ii)	Method 3113 B-10	manganese
611.645(b)	Method 6640 B-06	2,4-D
611.645(b)	Method 6640 B-06	2,4,5-TP
611.645(b)	Method 6640 B-06	dalapon
611.645(b)	Method 6640 B-06	dinoseb
611.645(b)	Method 6651 B-05	glyphosate
611.645(b)	Method 6640 B-06	pentachlorophenol
611.645(b)	Method 6640 B-06	picloram
611.802(c)(2)(A)(i)	Method 9223 B-04	E. coli
611.802(c)(2)(A)(ii)	Method 9223 B-04	E. coli
611.802(c)(2)(A)(vi)	Method 9221 F-06	E. coli
611.802(c)(2)(A)(viii)	Method 9223 B-04	E. coli
611.1052(a)(5)(A)(i)	sections 1 and 2 of Method 9221 B-06	total coliforms
611.1052(a)(5)(C)(i)	Method 9223 B-04	total coliforms
611.1052(a)(5)(C)(ii)	Method 9223 B-04	total coliforms
611.1052(a)(5)(C)(iii)	Method 9223 B-04	total coliforms
611.1052(a)(5)(D)	sections 1 of Method 9221 F-06	E. coli
611.1052(a)(5)(G)(i)	Method 9223 B-04	E. coli
611.1052(a)(5)(G)(ii)	Method 9223 B-04	E. coli
611.1052(a)(5)(G)(iii)	Method 9223 B-04	E. coli

Because these methods appear in the printed volume of 22nd edition of *Standard Methods*, the Board does not need to separately cite Standard Methods Online as a source. The regulated community is using the same method from either the 22nd edition of *Standard Methods* or from Standard Methods Online. The incorporation by reference to *Standard Methods* embraces the method from either source. The Board has added explanations to Board

notes appended to the Standard Methods Online incorporation by reference and the substantive provisions that authorize use of the methods. *See* notes appended to 35 Ill. Adm. Code 611.102(b) (Standard Methods Online), 611.381(b)(1)(B) and (d)(4)(B); 611.526(c) and (e); 611.531(a)(2)(A), (a)(2)(B), and (a)(2)(C); 611.611(a)(2), (a)(3), (a)(5), (a)(6), (a)(7), (a)(9), (a)(10), (a)(14), (a)(17), (a)(22) and (a)(25); 611.612(f)(2) and (f)(3); 611.645(b); 611.802(c)(2)(A); 611.1052(a)(5)(A), (a)(5)(C), (a)(5)(D) and 611.1052(a)(5)(G).

<u>The Proprietary Methods.</u> Three of the newly approved alternative equivalent methods for microbiological and chemical contaminants are from vendors of analytical media and equipment. The Board modified the short-form names that USEPA gave them. It is further useful to make observations on the nature of the methods.

<u>Colilert-18® Test.</u> Colilert-18® Test is a newly approved variation of an existing method. Colilert-18® Test is Standard Methods, 20th, 21st, or 22nd edition, using the commercial Colilert-18® medium by IDEXX Laboratories, Inc. USEPA uses the short-form name "Colilert-18®" for the method. The Board has added explanation at the definition of the short-form name and at the incorporations by reference to the various editions of Standard Methods, Method 9223 B that the variation of Method 9223 B takes its name from the commercial medium used. *See* The Board has changed this to "Colilert-18® Test" for consistency with treatment of other short-form methods names.

<u>Hach Method 10260.</u> Hach Method 10260 is from the Hach Company. The method uses parameter-specific "Chemkeys" and a meter produced by the Hach Company. The method approved by USEPA was dated April 2013. The Board obtained a copy of Hach Method 10260 from the USEPA rulemaking docket at the *Regulations.gov* website. The Board attempted to obtain the method from the Hach Company as described by USEPA. The Hach Company provided two documents, one for total chlorine and another for free chlorine. Both documents were dated August 2014. The Hach Company freely provided a copy of the Method on request, after explanation that the methods posted on their website were a different version.

That the Hach Company has posted different versions of Hach Method 10260 on their website than what USEPA approved could present a problem. USEPA allows use only of the approved version of the method. USEPA does not allow the use of later versions of any method until USEPA has approved the later version. Further, incorporation by reference to the method could be complicated if the version of the method incorporated by reference is not readily available.

 $\underline{\mathit{Chlordio}X^{\text{TM}}\mathit{Plus}\mathit{Test.}}$ The Chlordio $X^{\text{TM}}\mathit{Plus}\mathit{Test}$ is a method for chlorite and chlorine dioxide in drinking water. The method, developed by Palintest Ltd., uses proprietary sensors and equipment sold by that company. Palintest Ltd. freely provided the Board with a copy of the

¹ The three different short-form methods that are medium-based variations on Standard Methods, Method 9223 B are called "Colilert® Test," "Colilert-18® Test," and "Colisure™ Test" by the Board. All of the media are from IDEXX Laboratories, Inc. *See, e.g., Standard Method for the Examination of Water and Wastewater*, 20th ed. (1998), at p. 9-69.

method in the version approved by USEPA. The Board changed the short-form name of the method to "ChlordioX Plus Test" for consistency with other short-form method names.

<u>Tecta EC/TC P-A Method.</u> The Tecta EC/TC P-A Method is a fluorescent incubation broth method for simultaneous testing the presence or absence of *E. coli* and total coliforms. Veolia Water Solutions and Technologies developed the Tecta EC/TC P-A Method. USEPA described the version of the method approved as dated April 2014. Veolia Water Solutions and Technologies freely provided a copy of the method dated May 22, 2014, together with a July 24, 2014 letter from USEPA to ENDETEC Sensor Group (PC 1) explaining that the May 22, 2014 version is the approved version, and that USEPA will correct the date discrepancy in the future. The Board added "P-A" to the short-form method title.

Request for Comments on the Analytical Methods Amendments. The Board requested public comment on the incorporation of the USEPA June 19, 2014 summary approval of alternative equivalent methods and the June 27, 2014 corrections to that approval into the Illinois regulations. In particular, the Board requested comment on specific aspects of the methods updates:

- 1. The omission of separate citations to Standard Methods Online, Methods 2550-10; 3113 B-10; 5910-B-11; 6251 B-07; 6640 B-06; 6651 B-05; 9215 B-04; 9221 A, B, C, E, and F-06; 9222 B and D-06; 9223B-04, since the same methods appear in newly available *Standard Methods*, 22nd edition.
- 2. The short-form method names selected by the Board for the proprietary methods: "Colilert-18® Test," "Hach Method 10260," "ChlordioX™ Plus Test," and "Tecta EC/TC P-A Method."
- 3. The potential problems that might arise in use of Hach Method 10260 from the fact that the versions of the method most freely available from the Hach Company are later versions from that approved by USEPA.

By PC 2, USEPA stated that the Board is correct that the methods from Standard Methods Online listed in the first query are the same as the methods that appear in the 22nd edition of *Standard Methods*. USEPA, however, noted a series of errors in the method numbers stated in the Board notes appended to the segments of the rules that recite the various methods. The corrections that the Board has made to the text of the proposed amendments based on USEPA comments are included in Table 4 at the end of this opinion, attributed to USEPA.

Corrective Amendments

The Board routinely examines federal amendments and the base text of rules open for amendments to find any areas that need correction or clarification. JCAR and the Office of the Secretary of State also routinely examine the text and suggest corrections and clarifications. Sometimes suggestions arise from the Illinois Environmental Protection Agency, USEPA, or members of the regulated community. The Board often makes revisions as a result.

The revisions thus made are not directly derived from federal amendments. The Board is ever mindful of the limited discretion authorized in the context of an identical-in-substance

proceeding. The Board is limited to (1) "those changes that are necessary for compliance with the Illinois Administrative Code"; (2) "technical changes that in no way change the scope or meaning of any portion of the regulations"; (3) "USEPA rules that are not applicable to persons or facilities in Illinois"; (4) "things which are outside the Board's normal functions"; and (5) "apparent typographical and grammatical errors." *See* 415 ILCS 5/7.2(a), (a)(1), (a)(2), and (a)(7) (2010). Thus, the Board will only make minor, non-substantive corrections and clarifications in this context. These corrections are non-substantive in effect.

The Board is including a number of corrections and clarifications in this docket. The Board has cataloged a small number of necessary corrections and clarifications since the last SDWA update docket, SDWA Subtitle C Update, USEPA Amendments (January 1, 2013 through June 30, 2013), R14-8 (Jan. 23, 2014). This opinion and order does not include specific discussion of most of the particular corrective amendments in detail. All corrections are itemized in Table 3 at the end of this opinion. The following segments briefly discuss only the more significant of the corrections.

The Board requests that the Illinois Environmental Protection Agency (Agency), the Joint Committee on Administrative Rules (JCAR), USEPA and the regulated community review the table and the text of the corrections and comment as necessary. The Board also requests ongoing assistance of the Agency, JCAR, and the regulated community in the process of spotting and correcting errors or omissions in the rules. The Board requests that interested persons submit suggestions for the correction of any errors of which they become aware. The Board will either include the corrections in this docket or catalog them for future revisions if the suggestions relate to segments of the text that are not already involved in this proceeding.

Conforming Short-Form Names for Methods

The Board reviewed the short-form names in the text and made a limited number of changes for consistency. USEPA uses the trademark symbols "TM" and "®" in naming some of the proprietary methods. The Board has added the symbols to appear where USEPA has used them. The Board further standardized the method names. Thus, "Colisure Test" now appears as "Colisure Test," "Modified Colitag TM" is now "Modified Colitag TM Test," "Colilert-18" is now "Colilert-18® Test," and "Autoanalysis Colilert System" is now "Colilert® Test." The Board also added a definition of the short-form method names "Colilert® Test" and "Colilert-18® Test." The Board further added explanation that "Colilert® Test," "Colilert-18® Test," and "Colisure TM Test" are all variations of Standard Methods, Method 9223B based on the substrate used.

References to Repealed Provisions

The Board has found problems with references to repealed provisions in the rules. There are two groups of such references. The Board's approach to each group differs. In one group, the Board has shifted the references to make it clear that the cited provisions no longer exist. In the other group, the Board shifter the references to existing federal provisions.

<u>References to 35 Ill. Adm. Code 611.680 and 611.685.</u> Segments of the rules include references to 35 Ill. Adm. Code 611.680. See 611.742(a)(2)(B), (a)(2)(C)(i), (a)(5)(A), (a)(5)(B),

and 611.884(e). Segments of the rules include references to 35 III. Adm. Code 611.685. *See* 611.742(a)(1)(B), (a)(1)(C), (a)(2)(B), and (a)(2)(C)(i). The Board derived these provisions, relating to monitoring for total trihalomethanes (TTHM), from 40 C.F.R. 141.30(a), (b), and (e) (2005). The federal requirements were no longer effective after December 16, 2003. *See* 40 C.F.R. 141.12 (1999). USEPA removed the requirements effective March 6, 2006. *See* 71 Fed. Reg. 388 (Jan. 4, 2006). The Board removed 35 III. Adm. Code 611.680 in SDWA Update, USEPA Amendments (January 1, 2011 through June 30, 2011, R12-4 (Apr. 19, 2012), slip op. at 12-13, and 35 III. Adm. Code 611.685 in SDWA Update, USEPA Amendments (January 1, 2006 through June 30, 2006, R07-2, SDWA Update, USEPA Amendments (July 1, 2006 through December 31, 2006 (July 26, 2007), slip or. at 107-08.

The various provisions in 35 Ill. Adm. Code 611.742(a) that refer to 35 Ill. Adm. Code 611.680 and 611.685 relate to the use of TTHM data collected before adoption of the Interim Enhanced Surface Water Treatment Rule (IESWTR) in 1998. *See* 63 Fed. Reg. 69478 (Dec. 16, 1998); SDWA Update, USEPA Amendments (July 1, 1998 through December 31, 1998), R99-12 (July 22, 1998) (incorporating the IESWTR into the Illinois regulations). The IESWTR allowed the use of existing data collected pursuant to 40 C.F.R. 141.12 and 141.142 to determine applicability of segments of the rule. Those determinations were to have been made before March 31, 2000. *See* 40 C.F.R. 141.172(a)(1)(ii), (a)(1)(iii), (a)(2)(iii)(A), (a)(5)(i), and (a)(5)(ii). Further ,40 C.F.R. 141.142 (2000), the information collection rule provision, under which some of the monitoring data derived, expired on December 31, 2000. *See* 61 Fed. Reg. 24354 (May 14, 1996).

While it would appear that all of the grandfather provisions in 35 Ill. Adm. Code 611.742 no longer have operative effect, the Board cannot conclude that with any definiteness. Thus, the citations to the expired provisions must remain in the rule. Further, the reference to 35 Ill. Adm. Code 611.680 in 35 Ill. Adm. Code 884(e) is different. That reference relates to the dissemination of health effects information to persons served by the water supplier. That reference may have operative effect.

The Board has decided to reword the references to the expired provisions 35 Ill. Adm. Code 611.680 and 611.685 in the past tense. The Board has used the word "former" before each citation to Section 611.680 or 611.685. The has changed the verb phrases to past participles. *E.g.*, "any supplier having" is changed to "any supplier that had," "must develop" is changed to "must have developed," and "must monitor" became "must have monitored." *See* 35 Ill. Adm. Code 611.742(a)(6), (b)(1), and (b)(2). The Board further added explanation of former Sections 611.680 and 611.685 in Board notes appended to 35 Ill. Adm. Code 611.742 and 611.884. All of the revisions are listed in Table 3 at the end of this opinion.

<u>References to 35 Ill. Adm. Code 611.510.</u> The Consumer Confidence Rule (CCR) refers to the unregulated contaminant provision, 35 Ill. Adm. Code 611.510, which the Board repealed in 2003. The Board decided to remove the unregulated contaminants provision because USEPA and the Illinois Environmental Protection Agency had previously urged the Board that the provision was not a necessary element of the Illinois drinking water program. USEPA directly implements unregulated contaminant monitoring. *See* <u>SDWA Update, USEPA Amendments</u> (<u>July 1, 2002 through December 31, 2002</u>, R03-15 (Oct. 2, 2003), slip op. at 11-12. The Board did not, however, remove several references to the unregulated contaminants monitoring

requirements that are required segments of the Illinois program. Those references and their operative effect are as follows:

Provision	Operative Effect
611.883(d)(1)(B)	Requiring reporting information on unregulated contaminants found in unregulated contaminant monitoring.
611.907(a)	Requiring notice of availability of results from unregulated contaminants monitoring.
611.Appendix G, ¶ II.A	Listing failure to complete unregulated contaminants monitoring as a violation for which public reporting is required.
611.Appendix G, ¶ IV.C	Listing failure to make unregulated contaminants monitoring data available as a violation for which reporting is required.
611.Appendix G, note 14	Stating that some suppliers must engage in unregulated contaminants monitoring.

The operative requirement for unregulated contaminant monitoring is the USEPA provision, 40 C.F.R. 141.40. The Board cannot simply remove the references to unregulated contaminants monitoring because noncompliance with the monitoring requirements has operative effect in the Illinois regulations. For this reason, the Board has replaced the citations to repealed 35 Ill. Adm. Code 611.510 with citations to the operative federal requirement at 40 C.F.R. 141.40.

The Board has added a reference to 40 C.F.R. 141.40 to two references to unregulated contaminant monitoring that did not use a regulatory reference. The object is enhanced clarity. The affected provisions are 35 Ill. Adm. Code 611.883(d)(7) and 611.901(a)(3)(D).

Erroneous Cross-References to Microbiological Monitoring Requirements

When incorporating the federal Long-Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR) into the Illinois regulations, the Board erred. In translating the provision numbers for a federal microbiological monitoring requirement, the Board translated the corresponding Illinois provisions incorrectly. The Board rendered 40 C.F.R. 141.74(a) as 35 Ill. Adm. Code 611.231 and 40 C.F.R. 141.74(c) as 35 Ill. Adm. Code 611.233. *See* <u>SDWA Update, USEPA Amendments (January 1, 2002 through June 30, 2002; LT1ESWTR)</u>, R03-4 (Dec. 19, 2002), slip op. at p. 14, 18, 19, 20. These errors are now corrected to refer to 35 Ill. Adm. Code 611.531 and 611.533. *See* 35 Ill. Adm. Code 611.953(d), 611.955(b)(1) and (b)(2), and 611.956(a)(1).

Corrections to the RTCR

The Board made two errors when incorporating the federal RTCR into the Illinois drinking water regulations. The Board omitted 40 C.F.R. 141.855(d)(2), which USEPA had marked as "reserved." *See* SDWA Update, USEPA Amendments (January 1, 2013 through June 30, 2013), R14-8 (Jan. 23, 2014), slip or. at p. 271; 40 C.F.R. 141.855(d)(2) (2014). The *Illinois Administrative Code* codification requirements do not allow the use of a subsection (d)(1) without also having a subsection (d)(2). *See* 1 Ill. Adm. Code 100.340(f). For this reason, the Board added a statement to preserve structural consistency with the federal rules as a new subsection (d)(2).

The Board further failed to translate the federal provisions cited in paragraphs I.A.1b, 1c, 2b, and 2c in appendix to their Illinois counterparts. The Board now corrects that oversight, changing "141.860" to "611.1060" in the seven erroneous citations.

Request for Comments on the Corrective Amendments.

The Board requested public comment on the various corrective amendments included in this docket. The Board received no direct responses in this regard, although USEPA, IEPA, and JCAR submitted questions and suggestions for other corrections.

Corrections Added in Response to Public Comments

The Board received responses to requests for comments on a prior rulemaking, docket R14-8, from USEPA (PC 2), requests for changes from IEPA (PC 3), and queries from JCAR (PC 4), some of which have resulted in revisions to the proposal for public comment. The various changes made by the Board in response to the comments received appear in Table 4 at the end of this opinion. The following segments of discussion consider some of the more salient aspects of the comments received.

USEPA Responses to Requests for Comments in Prior Update Docket R14-8 (PC 2).

As discussed above, USEPA submitted a number of suggestions for correction of method designations in Board notes appended to segments of the regulations. USEPA further submitted responses to requests for comments that the Board made in a prior SDWA update docket, <u>SDWA Update</u>, <u>USEPA Amendments</u> (January 1, 2013 through June 30, 2013), R14-8 Jan. 23, 2014). The Board requests and USEPA responses are tabulated as follows:²

Board Request for Comment in Prior SDWA Update Docket R14-8

USEPA Response in PC 2

² The Board omitted two USEPA responses relating to laboratory certification that the Board included in <u>Amendments to Primary Drinking Water Standards:</u> 35 Ill. Adm. Code 611.490, R14-9 (Apr. 17, 2014).

- 1. Are there any Subpart B systems (systems that use surface water or groundwater under the influence of surface water) in Illinois that do not practice filtration? If not, should the Board retain the provisions for those systems in 35 Ill. Adm. Code 611.1056(c) and 611.1057(c)?
- This provision must be maintained, regardless of whether there are currently any Subpart B systems in Illinois that do not practice filtration, unless there is an explicit regulatory prohibition on unfiltered surface water and ground water under direct influence of surface water.
- 2. Are there any seasonal system suppliers in Illinois, as such are defined under the RTCR? If not, should the Board retain the provisions for those systems in 35 Ill. Adm. Code 611.1054(b), (c), (d), and (i); 611.1056(a)(4); and 611.1057(a)(4)?

Yes, there are seasonal systems in Illinois?

3. Is the Board's revision of "both a surface water source or a ground water source under direct influence of surface water, and a ground water source," in 40 C.F.R. 141.74(b)(6)(i) (2013), to "both a surface water source or a groundwater source under direct influence of surface water and a groundwater source," in 35 Ill. Adm. Code 611.533(c)(l), a correct clarification of USEPA's intent?

No, the Board should keep the comma for clarity.

4. Is the Board's substitution of "decision and supporting rationale must be documented in writing and approved and signed by the Agency, as a SEP issued pursuant to Section 611.11 0," in 35 Ill. Adm. Code 611.1053(c)(1)(C), for USEP A's language, "decision and supporting rationale must be documented in writing, and approved and signed by the supervisor of the State official who recommended the decision," in 40 C.F.R. 141.853(c)(l)(iii) (2013), a correct clarification of USEPA's intent?

Yes, this is acceptable, as it is presumed that all SEPs issued pursuant to Section 611.110 are approved and signed by a State supervisory official.

5. Does the Board's changing "approved construction standards," in 40 C.F.R. 141.854(e)(3) and 141.855(d)(l)(ii) (2013), to "Agency-approved construction standards," in 3 5 Ill. Adm. Code 611.1054(e)(3) and 611.1055(d)(l)(ii), overcome the lack of identity of the standards and effectuate what USEPA intended?

Yes, this is acceptable.

6. Does the omission of references to methods from Standard Methods Online where the same version of that method also appears in a bound volume of Standard Methods for the Examination of Water and Wastewater create a problem in allowing use of that version of the method from either source?

No, because Edition 22 of the Standard Methods and the Standard Online are the same.

Most of the USEPA responses require Board action. Three of the USEPA responses endorse the approach undertaken by the Board in the R14-8 SDWA update. A fourth response stresses that the Board must retain the provisions applicable to Subpart B systems (unfiltered systems that use surface water or groundwater under the influence of surface water)—without regard to whether any Subpart B systems exist in Illinois. A fifth response acknowledges that there are seasonal systems in Illinois.³

One USEPA response, however, indicates that a minor correction to one provision is required before USEPA will consider the Illinois rule involved can be considered equivalent to and no less stringent than the federal provision on which the Illinois rule is based.

The following provision appears in the federal Revised Total Coliform Rule:

The State may allow a public water system which uses both a surface water source or a ground water source under direct influence of surface water, and a ground water source, to take disinfectant residual samples at points other than the total coliform sampling points if the State determines that such points are more representative of treated (disinfected) water quality within the distribution system. 40 C.F.R. 141.74(b)(6)(i) (2014) (emphasis added).

When crafting equivalent language for the Illinois rules, the Board attempted to clarify this language by removing the commas. The Board observed as follows:

³ No Board action is required with regard to the two USEPA responses omitted from the list that relate to laboratory certification. *See supra* note 2.

The Board reads this to include two types of suppliers: (1) a supplier that uses both surface water and groundwater; and (2) a supplier that uses both groundwater under the influence of surface water and groundwater. For this reason, the Board has removed the commas from this segment of text to enhance the clarity. SDWA Update, USEPA Amendments (January 1, 2013 through June 30, 2013), R14-8 Jan. 23, 2014), slip op. at p. 12.

The resulting language in the corresponding Illinois provision adopted by the Board was as follows:

The Agency must allow a supplier that uses both a surface water source or a groundwater source under direct influence of surface water and a groundwater source to take disinfectant residual samples at points other than the total coliform sampling points if the Agency determines, by a SEP issued pursuant to Section 611.110, that such points are more representative of treated (disinfected) water quality within the distribution system. 35 Ill. Adm. Code 611.533(f)(1) (2014) (emphasis added).

By it response in PC 2, USEPA stated that the Board should retain the comma. In actuality, the Board removed two commas: one before and one after the clause "and a groundwater source." The Board agrees that the language adopted in the R14-8 still lacks clarity. Since USEPA has taken issue with the removal of the commas, the Board will restore the two commas in the interest of ensuring that the Illinois rule be the equivalent of its federal counterpart.

While the Board would normally delay making the revisions until the next time the DSWA regulations are open for amendment, the Board will add the correction to the present R15-6 update. First, the change involved is very minor and will not likely draw any public interest aside from that already shown by USEPA. Second, the Board is keenly interested in ensuring the prompt correction of errors in our identical-in-substance regulations to ensure that they comport with what USEPA requires. Finally, it is likely that the next update to the SDWA rules will not occur for a year or more. Having found that no USEPA actions occurred in the SDWA program that will require Board attention, the Board recently dismissed the next SDWA update docket. *See* SDWA Update, USEPA Amendments (July 1, 2014 through December 31. 2014), R15-16 (Feb. 5, 2015).

IEPA Requested Corrections (PC 3).

By PC 3, IEPA requested corrections to the SDWA rules. One requested correction relate to text involved in the present update. Two other requested corrections relate to existing rules adopted in earlier updates whose text is not involved in the present proceeding. The corrections relating to the earlier updates are based on comments from USEPA, which IEPA attached to PC 3.

<u>IEPA-Requested Corrections to the Present Update.</u> IEPA requested that the Board separate two analytical methods into separate listings. The Board added two methods as 35 Ill. Adm. Code 611.531(a)(2)(D)(iv) in an earlier update. *See* SDWA Update, USEPA Amendments

(January 1, 2009 through June 30, 2009), R10-1, SDWA Update, USEPA Amendments (July 1, 2009 through December 31, 2009), R10-17, SDWA Update, USEPA Amendments (January 1, 2010 through June 30, 2010), R11-6, slip or. at p. 130. Because 35 Ill. Adm. Code 611.531(a)(2)(D)(iv) was the maximum indent level allowed by the *Illinois Administrative Code* codification requirements (*see* 1 Ill. Adm. Code 100.340(d) (2014)), the Board has organized this provision by method type, and the Board placed two methods of the same type into the same subsection.

By PC 3, IEPA claimed that there is a potential for confusion because two methods appear listed together. Without regard to whether the Board perceives a potential for confusion, the Board has accepted the IEPA suggestion. The Board has separated the methods designated as "Mitchell Method M5331" and "AMI Turbiwell Method" into two separate listings for on-line nephelometry.

IEPA-Requested Corrections to Past Updates Based on USEPA Comments. IEPA further requested that the Board correct two segments of the SDWA rules in response to comments made by USEPA and forwarded to the Board by IEPA. Neither of the provisions involved, 35 Ill. Adm. Code 611.130 and 611.742 was a segment of the proposal for public comment. Thus, the Board must add these two provisions to this rulemaking if the Board is to make the corrections at this time.

In the attachment to PC 3, USEPA evaluated the equivalency of the two Illinois provisions with their federal counterparts as follows in the attachment to PC 3:⁴

<u>Fed</u>	<u>leral</u>	Rul	<u>e</u>

§141.26(b)(ii) For iodine-131, a composite of five consecutive daily samples shall be analyzed once each quarter. As ordered by the State, more frequent monitoring shall be conducted when iodine-131 is identified in the finished water.

State Rule

Section 611.732(b)(2) For iodine-131, a composite of five consecutive daily samples must be analyzed once each quarter. The Agency may, by a SEP issued pursuant to Section 611.110, order more frequent monitoring for iodine-131 where it is identified in the finished water.

Comment

It is USEPA's interpretation that the word "may" is not as stringent as the word "shall" in the federal rule. The Rule's intent is that more frequent monitoring must be ordered by the State when iodine-131 is identified in the finished water. It was not meant to be an option of the State.

Suggested rewording: "More frequent monitoring must be conducted, as specified by the Agency, pursuant to a SEP issued under Section 611.110 for iodine-131, where it is identified in the finished water."

⁴ The Board reproduces the USEPA comments verbatim, reformatting the table from landscape to portrait mode and omitting a first column that numbers the USEPA comments, which is unnecessary in the present context.

142.65(a)(6)
Community water systems that use bottled water as a condition for receiving a variance or an exemption from the requirements of \$141.66 of this chapter must meet the requirements specified in either \$142.62(g)(1) or \$142.62(g)(2) and (g)(3).

611.130(f)(6) Special Requirements for Certain Variances and Adjusted Standards Subsection (f)(6) A CWS supplier that uses bottled water as a condition for receiving relief equivalent to a federal section 1415 variance or a section 1416 exemption from the requirements of Section 611.330 must meet the requirements specified in either subsections (d)(l) through (d)(3).

The USEPA intent of this requirement is that sufficient quantities of bottled water, as described in subsection (d)(G), are available from the public water system, whether the water system uses the provisions of subsection (d)(1), (d)(2) and (d)(3) or the provisions of (d)(4) and (d)(5) or (d)(4) through (d)(6) of this Section.

Suggested rewording: "... Section 611.330 must meet the requirements specified in either subsections (d)(1), (d)(2), (d)(3), and (d)(6) or (d)(4), (d)(5), and (d)(6) of this Section." (This wording currently appears in the state rule at 611.130(d).)

The Board views these USEPA observations as fundamental for maintenance of the Illinois Primary Drinking Water Regulations. These comments arose in the context of USEPA primacy review of the Illinois regulations. USEPA has found these Illinois rules as less stringent than their federal counterparts. *See* 42 U.S.C. § 300g-2(a) (2011). The Board either correct these provisions in a way that is acceptable to USEPA or make explanation that these provisions are no less stringent than their federal counterparts to the satisfaction of USEPA.

The Board has opted to revise the two provisions to make them equivalent to their federal counterparts. The following paragraphs consider the revisions to the two provisions separately before determining whether to add the corrections to this proceeding at this time.

Revision of 35 Ill. Adm. Code 611.732(b)(2). The Board adopted 35 Ill. Adm. Code 611.732(b)(2) in SDWA Update, USEPA Amendments (July 1, 2000 through December 31, 2000; Radionuclides), R01-20 (Oct. 4, 2001). It is based on 40 C.F.R. 141.26(b)(2)(ii), which requires the State to order more frequent monitoring for iodine-131 when this contaminant is identified in a supplier's finished drinking water. When adapting the federal requirement to the Illinois regulations, the Board chose to use the mechanism of a special exception permit (SEP) to allow IEPA to impose the more frequent monitoring. The Board erred in using the permissive "may" instead of the mandatory "must" when referring to IEPA issuing the SEP. Once IEPA has made the determination that iodine-131 is present in the finished water, whatever discretion IEPA had in making the determination is exhausted. After making the determination, IEPA must issue the SEP.

The Board accepts the revision as suggested in the USEPA comments attached to PC 3, with two exceptions. First, as is explained below in the discussion of general revisions and deviations from federal text, the Board strongly prefers use of "must" for mandatory provisions over the use of "shall." The word "shall" permits non-mandatory uses. Dictionary.com. Collins

English Dictionary - Complete & Unabridged 10th Edition. HarperCollins Publishers. http://dictionary.reference.com/browse/shall (accessed: February 13, 2015). Further, the Board prefers the use of "require" in place of "order" and to move the auxiliary and main verbs together before the parenthetical, "by a SEP issued pursuant to Section 611.110." Finally, the Board prefers use of "iodine-131" in place of the pronoun "it." Thus, the Board prefers the following revisions for this provision:

For iodine-131, a composite of five consecutive daily samples must be analyzed once each quarter. The Agency-may must require, by a SEP issued pursuant to Section 611.110, order-more frequent monitoring for iodine-131 where it-iodine-131 is identified in the finished water.

Revision of 35 Ill. Adm. Code 611.130(f)(6). The Board adopted 35 Ill. Adm. Code 611.130(f)(6) as 35 Ill. Adm. Code 611.130(g)(6) in SDWA Update, USEPA Amendments (July 1, 2000 through December 31, 2000; Radionuclides), R01-20 (Oct. 4, 2001). This provision is based on 40 C.F.R. 142.65(a)(6), which requires a supplier that uses bottled water as a condition for relief from a radionuclide maximum contaminant level (MCL) to comply with "either \$ 142.62(g)(1) or \$ 142.62(g)(2) and (g)(3)." This is ambiguous depending on whether "\$ 142.62(g)(1)" or "\$ 142.62(g)(2) and (g)(3)" or "\$ 142.62(g)(1) and (g)(3)" or "\$ 142.62(g)(2) and (g)(3)" is intended. The Board codified 40 C.F.R. 142.62(g)(1) as 35 Ill. Adm. Code 611.130(d)(1) through (d)(3), 40 C.F.R. 142.62(g)(2) as 35 Ill. Adm. Code 611.130(d)(4) and (d)(5), and 40 C.F.R. 142.62(g)(3) as 35 Ill. Adm. Code 611.130(d)(6). Thus, literally inserting the Illinois provisions into this segment of 40 C.F.R 142.65(a)(6), the provision would read as "either 35 Ill. Adm. Code 611.130(d)(1) through (d)(3) or 611.130(d)(4) and (d)(5) and 611.130(d)(6)." Splitting the three federal provisions into six provisions in the Illinois rules compounds the ambiguity.

The Board attempted to cure the ambiguity by using "either subsections (d)(1) through (d)(3) or (d)(4) through (d)(6) of this Section. The Board erred in that USEPA intended that subsection (d)(6) should apply in both instances—i.e., USEPA intended "\$ 142.62(g)(1) and (g)(3)" or "\$ 142.62(g)(2) and (g)(3)."

The Board prefers language that differs from that suggested by USEPA. The Board would revise the language of this segment of 35 Ill. Adm. Code 611.130(f)(6) as follows:

subsection (d)(6) of this Section and either subsections (d)(1) through (d)(3) or (d)(4) through (d)(6) and (d)(5) of this Section.

Expediting Revision of 35 Ill. Adm. Code 611.732(b)(2) and 611.130(f)(6). The Board has the alternative of waiting until a future identical-in-substance update to the SDWA rules before acting to correct the deficiencies in the Illinois rules pointed out by USEPA. These

⁵ The provision became subsection (f)(6) when the Board removed a subsection and renumbered the remaining subsections in <u>SDWA Update</u>, <u>USEPA Amendments</u> (January 1, 2003 through <u>June 30, 2003</u>), R04-3 (Mar. 4, 2004).

corrections, however, are important because the Illinois rules are less stringent than their federal counterparts until these deficiencies are corrected.

For the reasons recited above with regard to the correction to 35 Ill. Adm. Code 611.533 prompted by PC 2, the Board will expedited the corrections to 35 Ill. Adm. Code 611.732 and 611.130. (1) The change involved is very minor and will not likely draw any public interest aside from that already shown by USEPA. (2) The Board is keenly interested in ensuring the prompt correction of errors in our identical-in-substance regulations to ensure that they comport with what USEPA requires. (3) It is likely that the next update to the SDWA rules will not occur for a year or more.

Corrections based on the JCAR Queries (PC 4).

By PC 4, JCAR asked a series of questions about the text of the proposal for public comment. The Board responded to JCAR directly by e-mail. The Board wishes to memorialize the JCAR questions and Board responses in this opinion and order. This is especially important since several corrections resulted from the JCAR queries.

The following table recites the JCAR queries and Board responses. The table will serve as the Board's discussion of the JCAR questions and the corrections made in response.

JCAR Query

- 1. In 611.102(b), should ASTM Methods D3859-98 B, D3859-03 B, and 3859-08 B be "Method B—Atomic Absorbtion" or "... Atomic Absorption"?
- 2. In the Board Note under Standard Methods Online *I* Method 9230 B-04, should there be additional text between "(silvex)," and "(dalapon, dinoseb . . . "?
- 3. Could you please verify whether the paragraph devoted to USDHS, STD is properly indented?

Board Response

- 1. Indeed those are three misspellings that I have marked for correction. I notice that the misspelling also appears in the Board note attached to Section 611.381(d)(4)(B), which I have also marked for correction.
- 2. Another error that should have enclosed all of the analytes in a single set of parentheses. I have made the correction.
- 3. The indent level on that paragraph was indeed incorrect. It is now corrected.

- 4. Under "USEPA, ORD", is there any redundancy in the incorporation of USEPA NERL Method 525.3?
- 4. There is redundancy that arises from the title format used by USEPA. The method title for many of the NERL methods begins with the method number, as it does for Method 525.3. The Board has corrected this entry by retaining the short-form designation "USEPA NERL Method 525.3, ver. 1.0" and deleting the same words from the beginning of the method title. Examination of the text of the rules indicates that the method is listed as from USEPA Organic Methods throughout Section 611.645. I have corrected this to NERL for each of the 16 appearances of this error.
- 5. In 611.381(b)(I)(A)(ii), should there be slashes between "purge and trap", "gas chromatography", and "electron capture detector" rather than the existing commas?
- 5. You are correct that references and titles of gas chromatography-mass spectrometry methods commonly use a hyphen or a virgule to separate the names of the two segments of the method. For the sake of consistency, I have changed the commas separating "gas chromatography, mass spectrometer" to hyphens in Section 611.381(b)(1)(A)(ii). The same correction was made in Section 611.381(b)(1)(A)(iv).
- 6. In 611.381 (b)(l)(C)(iii), should plasma-mass be plasma/mass?
- 6. See item (5) above. The Board has used the virgule only in the quoted titles for methods. In recitation of the method type, the Board has consistently used a hyphen, as in Section 611.381(b)(1)(C)(iii). I made no change.
- 7. In 611.645(a), should the entries be in alphabetical order?
- 7. In reviewing the alphabetical order of the entries in Section 611. 645(a), I observed that the entries for 1,2,4-trichlorobenzene and 1,1,2-trichloroethane were not in appropriate order. I have moved the entries into appropriate positions in the table.
- 8. In 611.645(a), why are there 2 entries for toluene?
- 8. The second entry for toluene was a relic from some prior amendments. I have removed it.

- 9. In 611.645(b), should the entries for Di(2-ethylhexyl)adipate and Di(2-ethylhexyl)phthalate be "ver. 1.0" or "rev. 1.0"?
- 9. The method titles for USEPA Organic Methods use "revision." The method titles for NERL Methods (see item 4 above) use "version." The Board has followed the mthod titles in using "ver." or "rev." I made no changes.

General Revisions and Deviations from the Federal Text

Incorporating the federal rules into the Illinois system requires some unavoidable deviation from the federal text. This deviation arises primarily through differences between the federal and state regulatory structure and systems. Some deviation also arises through errors in and problems with the federal text itself. The Board adapts the federal text to the Illinois rules and regulatory scheme and corrects errors found in the text in the course of these routine update rulemakings.

In addition to the amendments derived from federal amendments, the Board often finds it necessary to alter the text of various passages of the existing rules as provisions are opened for update in response to USEPA actions. This involves correcting deficiencies, clarifying provisions, and making other changes that are necessary to establish a clear set of rules that closely parallel the corresponding federal requirements within the codification scheme of the Illinois Administrative Code.

The Board updates the citations to the Code of Federal Regulations to the most recent version available. As discussed above, the most recent versions of the *Code of Federal Regulations* available to the Board is the July 1, 2012 edition for USEPA regulations (Title 40). Thus, the Board has updated all citations to Title 40 to the 2012 edition of the *Code of Federal Regulations*, adding references to later amendments using their appropriate *Federal Register* citation, where necessary.

The Board substituted "or" for "/" in most instances where this appeared in the federal base text, using "and" where more appropriate. The Board further used this opportunity to make a number of corrections to punctuation, grammar, spelling, and cross-reference format throughout the opened text. The Board changed "who" to "that" and "he" or "she" to "it," where the person to which the regulation referred was not necessarily a natural person, or to "he or she," where a natural person was evident; changed "which" to "that" for restrictive relative clauses; substituted "must" for "shall"; capitalized the section headings and corrected their format where necessary; and corrected punctuation within sentences.

In addition, the federal rules have been edited to establish a uniform usage throughout the Board's regulations. For example, with respect to "shall," "will," and "may," "must" is used when an action is required by the rule, without regard to whether the action is required of the subject of the sentence or not. "Shall" is no longer used, since it is not used in everyday language. Thus, where a federal rule uses "shall," the Board substitutes "must." This is a break from our former practice where "shall" was used when the subject of a sentence has a duty to do something. "Will" is used when the Board obliges itself to do something. "May" is used when

choice of a provision is optional. "Or" is used rather than "and/or," and denotes "one or both." "Either . . . or" denotes "one but not both." "And" denotes "both."

JCAR has requested that the Board refer to the United States Environmental Protection Agency in the same manner throughout all of our bodies of regulations—*i.e.*, air, water, drinking water, RCRA Subtitle D (municipal solid waste landfill), Resource Conservation and Recovery Act (RCRA) Subtitle C (hazardous waste), underground injection control (UIC), etc. The Board has decided to refer to the United States Environmental Protection Agency as "USEPA." The Board will continue this conversion in future rulemakings as additional sections become open to amendment. The Board will further convert "EPA" used in federal text to "USEPA," where USEPA is clearly intended.

As is described in the following segment, the Board has assembled tables to aid in the location of these alterations to the text.

<u>Tabulations of Deviations from the Literal Text of the Federal Amendments</u> and Miscellaneous Board Housekeeping Amendments

The tables below list numerous corrections and amendments that are not based on current federal amendments. Table 1 (beginning immediately below) lists a number of federal amendments that the Board has not included in this docket. Table 1 gives a brief explanation why the Board has declined to make each. Table 2 (beginning immediately after Table 1) includes deviations made in this proposal for public comment from the verbatim text of the federal amendments. Table 3 (beginning immediately after Table 2) contains corrections and clarifications that the Board made in the base text involved in this proposal. The amendments listed in Table 3 are not directly derived from the current federal amendments. Some of the entries in these tables are discussed further in appropriate segments of the general discussion above in this opinion. Table 4 is a listing of revisions made to the text of the amendments from that proposed and set forth in the Board's opinion and order of November 6, 2014. Table 4 indicates the changes made, as well as the source that suggested each of the changes. Table 5 indicates suggested revisions that the Board has not made in adopting these amendments. Each entry gives a brief explanation why the Board did not incorporate the suggested change.

Table 1: Federal Amendments That Are Not Necessary in This Docket

Provision Citations
40 C.F.R./
35 Ill. Adm. Code

<u>USEPA Amendment/</u> Explanation Why Not Made in This Docket

141, appendix A to subpart C, note 13/611.102(b), CPI International, Inc.

The Illinois rule recites "5580 Skyline Blvd.," so correction from "580 Skyline Blvd." is not necessary.

141, appendix A to subpart C, notes 9, 14, 16, 18, and 29/ 611.102(b), USEPA, OGWDW The Board did not change the web address for access to USEPA, OGWDW methods from "http://www.epa.gov/safewater/methods/" to "http://water.epa.gov/drink/" because the older web address still works.

141, appendix A to subpart C, table for 141.131(b)(1), HAA5)/611.381(b)(1)(B)(i

Omitted a separate listing for Standard Methods Online, Method 6251 B-07 as an approved alternative method for HAA5 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.381(b)(1)(B) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.131(b), ultraviolet absorption at 254 nm/ 611.381(d)(4)(B) Omitted a separate listing for Standard Methods Online, Method 5910 B-11 as an approved alternative method for ultraviolet absorption at 254 nm because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.381(d)(4)(B) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.21(f)(3), total coliforms/611.526(c)(1)

Omitted a separate listing for Standard Methods Online, Method 9221 A, B-06 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.526(c) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.21(f)(3), total coliforms/611.526(c)(4)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.526(c) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.21(f)(5), fecal coliforms/611.526(e)(3)

Omitted a separate listing for Standard Methods Online, Method 9221 E-06 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.526(e) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.21(f)(6), *E. coli/* 611.526(f)(11)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.526(f) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.74(a)(1), total coliforms/611.531(a)(2)(A)(i)

Omitted a separate listing for Standard Methods Online, Methods 9221 A, B, and C-06 as approved alternative methods for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(A) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.74(a)(1), total coliforms/611.531(a)(2)(A)(iii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(A) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.74(a)(1), fecal coliforms/611.531(a)(2)(B)(i)

Omitted a separate listing for Standard Methods Online, Method 9221 E-06 as an approved alternative method for fecal coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(B) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.74(a)(1), fecal coliforms/611.531(a)(2)(B)(ii)

Omitted a separate listing for Standard Methods Online, Method 9222 D-06 as an approved alternative method for fecal coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(B) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.74(a)(1), fecal coliforms/611.531(a)(2)(C)(i)

Omitted a separate listing for Standard Methods Online, Method 9215 B-04 as an approved alternative method for heterotrophic bacteria because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(C) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), antimony/611.611(a)(2)(D)(i)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(2) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), arsenic/611.611(a)(3)(C)(ii)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(3) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), barium/611.611(a)(5)(D)(i)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(5) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), beryllium/611.611(a)(6)(D)(ii)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(6) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), cadmium/611.611(a)(7)(D)(i)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(7) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), chromium/ 611.611(a)(9)(D)(i)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(9) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), copper/ 611.611(a)(10)(A)(ii) Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(10) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), lead/ 611.611(a)(14)(A)(ii) Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(14) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), lead/ 611.611(a)(17)(E)(i) Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(14) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), lead/ 611.611(a)(22)(D)(ii) Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(14) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.23(k)(1), temperature/611.611(a)(25)

Omitted a separate listing for Standard Methods Online, Method 2550-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(a)(25) Board note in Table 2 below.

141, appendix A to subpart C, table for 143.4(b), iron/611.612(f)(2)(A)(ii)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(f)(2) Board note in Table 2 below.

141, appendix A to subpart C, table for 143.4(b), manganese/611.612(f)(3)(A)(ii)

Omitted a separate listing for Standard Methods Online, Method 3113 B-10 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.611(f)(3) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), 2,4-D/ 611.645(b), 2,4-D Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), 2,4,5-TP (silvex)/ 611.645(b), 2,4,5-TP (silvex) Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), dalapon/ 611.645(b), dalapon Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), dinoseb/611.645(b), dinoseb

Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), glyphosate/ 611.645(b), glyphosate Omitted a separate listing for Standard Methods Online, Method 6651 B-05 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), pentachlorophenol/ 611.645(b), pentachlorophenol Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.24(e)(1), picloram/ 611.645(b), picloram Omitted a separate listing for Standard Methods Online, Method 6640 B-06 because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.645(b) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.802(c)(2), *E. coli/* 611.802(c)(2)(A)(i)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(c)(2)(A) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.802(c)(2), *E. coli/* 611.802(c)(2)(A)(ii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(c)(2)(A) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.802(c)(2), *E. coli/* 611.802(c)(2)(A)(vi)

Omitted a separate listing for Standard Methods Online, Method 9221 F-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(c)(2)(A) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.802(c)(2), *E. coli/* 611.802(c)(2)(A)(viii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(c)(2) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.852(a)(5), total coliforms/ 611.1052(a)(5)(A)(i) Omitted a separate listing for Standard Methods Online, Method 9221 B.1 and B.2-06 as approved alternative methods for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.1052(a)(5) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.852(a)(5), total coliforms/611.1052(a)(5)(C)(i)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.1052(a)(5) Board note in Table 2 below. See the entry for 35 Ill. Adm. Code 611.1052(a)(5)(C)(ii) Board note in Table 3 below.

141, appendix A to subpart C, table for 141.852(a)(5), total coliforms/ 611.1052(a)(5)(C)(ii) Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.1052(a)(5)(C)(ii) Board note in Table 2 below. See the entry for 35 Ill. Adm. Code 611.802(a)(5) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.852(a)(5), total coliforms/611.1052(a)(5)(C)(iii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(a)(5) Board note in Table 2 below. See the entry for 35 Ill. Adm. Code 611.1052(a)(5)(C)(ii) Board note in Table 3 below.

141, appendix A to subpart C, table for 141.852(a)(5), *E. coli/* 611.1052(a)(5)(D)

Omitted a separate listing for Standard Methods Online, Method 9221 F.1-06 as an approved alternative method for total coliforms because this is the method included in Standard Methods, 22nd edition.

141, appendix A to subpart C, table for 141.852(a)(5), *E. coli/* 611.1052(a)(5)(G)(i)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 III. Adm. Code 611.1052(a)(5) Board note in Table 2 below. See the entry for 35 III. Adm. Code 611.1052(a)(5)(G)(ii) Board note in Table 3 below.

141, appendix A to subpart C, table for 141.852(a)(5), *E. coli/* 611.1052(a)(5)(G)(ii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.1052(a)(5)(G)(ii) Board note in Table 2 below. See the entry for 35 Ill. Adm. Code 611.802(a)(5) Board note in Table 2 below.

141, appendix A to subpart C, table for 141.852(a)(5), *E. coli/* 611.1052(a)(5)(G)(iii)

Omitted a separate listing for Standard Methods Online, Method 9223 B-04 as an approved alternative method for *E. coli* because this is the method included in Standard Methods, 22nd edition. See the entry for 35 Ill. Adm. Code 611.802(a)(5) Board note in Table 2 below. See the entry for 35 Ill. Adm. Code 611.1052(a)(5)(C)(ii) Board note in Table 3 below.

141, appendix A to subpart Q, endnote 1/ 611.Appendix G, endnote 1 USEPA change from "\\$ 141.202(a) and \\$ 141.203(a)" to "\\$\\$ 141.202(a) and 141.203(a)" was not necessary.

141, appendix A to subpart Q, endnote 2/611. Appendix G, endnote 1

USEPA addition of ending period was not necessary.

141, appendix A to subpart C, table for 143.4(b), aluminum/ No Illinois Provision Illinois regulations do not require monitoring for aluminum in drinking water.

141, appendix A to subpart C, table for 143.4(b), chloride/ No Illinois Provision Illinois regulations do not require monitoring for chloride in drinking water.

141, appendix A to subpart C, table for 143.4(b), silver/ No Illinois Provision	Illinois regulations do not require monitoring for silver in drinking water.
141, appendix A to subpart C, table for 143.4(b), sulfate/ No Illinois Provision	Illinois regulations do not require monitoring for sulfate in drinking water.
141.852(a)(5), total coliforms, enzyme substrate methods	The movement of Standard Methods Online, Method 9223 B-97 from column 3 to column 4 is not necessary because the Board used a paragraph format, rather than a tabular format, and the Board originally codified the method as Standard Methods, 22nd ed., Method 9223 B.
142.16(q)(2)/ No Illinois Provision	This is a state primacy provision that is not necessary in the Illinois regulations.
142.16(q)(2)(ii)/ No Illinois Provision	This is a state primacy provision that is not necessary in the Illinois regulations.

Table 2: Deviations from the Text of the Federal Amendments

Illinois Section	40 C.F.R. Section	Revision(s)
611.102(a), "ChlodioX Plus Test"	141, appendix A to subpart C, table for 141.74(a)(2) and 141.131(b)(1), chlorine dioxide, and 141.131(c)(1), chlorite	Added the definition of the short-form method name, "ChlordioX Plus Test." See the entries for 611.381(b)(1)(D)(ii) and (c)(1)(D)(iii) and 611.531(b)(3)(A)(ii), below in this Table 2.
611.102(a), "Colilert- 18® Test"	141, appendix A to subpart C, table for 141.402(c)(2) and 141.852(a)(5), <i>E. coli</i> , 141.852(a)(5), total coliforms	Added the definition of the short-form method name, "Colilert-18® Test." See the entries for 611.802(c)(2)(A)(viii) and 611.1052(a)(5)(C)(ii) and (a)(5)(G)(ii) below in this Table 2.

611.102(a), "Hach Method 10260"	141, appendix A to subpart C, table for 141.74(a)(2) and 141.131(c)(1), free chlorine; 141.74(a)(2) and 141.131(c)(1), total chlorine; and 141.131(c)(1), combined chlorine	Added the definition of the short-form method name, "Hach Method 10260." See the entries for 611.381(c)(1)(A)(iii), (c)(1)(B)(iii), and (c)(1)(C)(iv) and 611.531(b)(1)(C)(ii) and (b)(2)(D)(ii) below in this Table 2.
611.102(a), "Tecta EC/TC P-A Test"	141, appendix A to subpart C, table for 141.21(f)(3) and 141.852(a)(5), total coliforms, and 141.74(f)(6), 141.402(c)(2), and 141.852(a)(5), <i>E. coli</i>	Added the definition of the short-form method name, "Tecta EC/TC P-A Test." See the entries for 611.526(c)(12) and (f)(13), 611.802(c)(2)(A)(xii), and 611.1052(a)(5)(C)(vii) and (a)(5)(G)(vii) below in this Table 2.
611.102(b), ASTM, ASTM Method D3223- 12	141, appendix A to subpart C, table for 141.23(k)(1), mercury	Changed "D 3223-12" to the standardized format "D3223-12"; added "approved 2012"; added "referenced in Section 611.611" offset by a comma.
611.102(b), ASTM, ASTM Method D4327- 11	141, appendix A to subpart C, table for 141.23(k)(1), fluoride, nitrate, nitrite, and orthophosphate	Changed "D 4327-11" to the standardized format "D4327-11"; added "approved 2011"; added "referenced in Section 611.611" offset by a comma.
611.102(b), The Hach Company, Hach Method 10260	141, appendix A to subpart C, tables, note 31	Added "referred to as 'Hach Method 10260" in parentheses; "referenced in Sections 611.381 and 611.531" offset by a comma.
611.102(b), Palintest, Ltd.	141, appendix A to subpart C, tables, note 32	Removed "Suite 100" from parentheses and offset it with a comma.
611.102(b), Palintest, Ltd., ChlordioX Plus	141, appendix A to subpart C, tables, note 32	Changed the period after the short-form method title to a comma; changed the short-form method title from "ClordioX Plus" to "ChlordioX Plus Test"; "referenced in Sections 611.381 and 611.531" offset by a comma.

611.102(b), Veolia Water Solutions and Technologies, Tecta EC/TC P-A Test	141, appendix A to subpart C, tables, note 33	Changed the period after the short-form method title to a comma; "referenced in Section 611.526" offset by a comma.
611.381(b)(1)(B) Board note	141, appendix A to subpart C, table for 141.131(b)(1), HAA5	Added explanation of USEPA approval of Standard Methods Online, Method 6251 B-07 as an approved alternative method for HAA5; added explanation of omission of a separate listing for the Standard Methods Online version. See the entry for 35 Ill. Adm. Code 611.381(b)(1)(B)(i) in Table 1 above.
611.381(b)(1)(D)(ii)	141, appendix A to subpart C, table for 141.131(b)(1), chlorite	Revised the tabular format to a standard paragraph format; combined "Chlorite—daily monitoring as prescribed in 40 CFR 141.132(b)(2)(i)(A)" from the first column with "Amperometric Sensor" from the second column for "By amperometric sensor for daily monitoring pursuant to Section 611.382(b)(2)(A)(i)" followed by a colon; changed the short-form method title from "ChlordioX Plus" to "ChlordioX Plus Test." See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2.
611.381(b)(1)(D) Board note	141, appendix A to subpart C, table for 141.131(b)(1), chlorite	Added explanation of USEPA approval of ChlordioX Plus as an approved alternative method for chlorite.
611.381(c)(1)(A)(iii)	141, appendix A to subpart C, table for 141.131(c)(1), free chlorine	Revised the tabular format to a standard paragraph format; added the conjunction "or" followed by the short-form method name, "Hach Method 10260." See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" above in this Table 2

Table 2.

611.381(c)(1)(A) Board note	141, appendix A to subpart C, table for 141.131(c)(1), free chlorine	Added explanation of USEPA approval of Hach Method 10260 as an approved alternative method for free chlorine.
611.381(c)(1)(B)(iii)	141, appendix A to subpart C, table for 141.131(c)(1), combined chlorine	Revised the tabular format to a standard paragraph format; added the conjunction "or" followed by the short-form method name, "Hach Method 10260." See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" above in this Table 2.
611.381(c)(1)(B) Board note	141, appendix A to subpart C, table for 141.131(c)(1), combined chlorine	Added explanation of USEPA approval of Hach Method 10260 as an approved alternative method for combined chlorine.
611.381(c)(1)(C)(iv)	141, appendix A to subpart C, table for 141.131(c)(1), total chlorine	Revised the tabular format to a standard paragraph format; added the conjunction "or" followed by the short-form method name, "Hach Method 10260." See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" above in this Table 2.
611.381(c)(1)(C) Board note	141, appendix A to subpart C, table for 141.131(c)(1), total chlorine	Added explanation of USEPA approval of Hach Method 10260 as an approved alternative method for total chlorine.
611.381(c)(1)(D)(iii)	141, appendix A to subpart C, table for 141.131(c)(1), chlorine dioxide	Revised the tabular format to a standard paragraph format; added the colon after "amperometric sensor" changed to lower-case from the second column, followed by the short-form method name, "ChlordioX Plus"; changed the short-form method title from "ChlordioX Plus" to "ChlordioX Plus Test"; added the ending colon and conjunction "or." See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2.

141, appendix A to Added explanation of USEPA approval 611.381(c)(1)(D) Board subpart C, table for of ChlordioX Plus as an approved note 141.131(c)(1), chlorine alternative method for chlorine dioxide. dioxide 611.381(d)(4)(B) Board 141, appendix A to Added explanation of USEPA approval of Standard Methods Online, Method subpart C, table for note 141.131(b)(1), HAA5 5910 B-11 as an approved alternative method for ultraviolet absorption at 254 nm; added explanation of omission of a separate listing for the Standard Methods Online version. See the entry for 35 Ill. Adm. Code 611.381(d)(4)(B) in Table 1 above. Revised the tabular format to a standard 141, appendix A to 611.526(c)(12) subpart C, table for paragraph format; changed "Tecta EC/TC" to "Tecta EC/TC P-A Test." 141.21(f)(3), total coliforms See the entry for 35 Ill. Adm. Code 611.102(a), "Tecta EC/TC P-A Test" above in this Table 2. Added explanation of USEPA approval 611.526(c) Board note 141, appendix A to subpart C, table for of Standard Methods Online, Methods 141.21(f)(3), total 9221 A. B-06 and 9223 B-04 as coliforms approved alternative methods for total coliforms; added explanation of omission of a separate listing for the Standard Methods Online versions: added explanation of USEPA approval of Tecta EC/TC P-A Test as an approved alternative method for total coliforms. See the entries for 35 Ill. Adm. Code 611.526(c)(1) and (c)(4) in Table 1 above. 611.526(e) Board note 141, appendix A to Added explanation of USEPA approval subpart C, table for of Standard Methods Online, Method 141.21(f)(5), fecal 9221 E-06 as an approved alternative coliforms method for fecal coliforms; added explanation of omission of a separate listing for the Standard Methods Online version. See the entry for 35 Ill. Adm.

Code 611.526(e)(3) in Table 1 above.

141, appendix A to Revised the tabular format to a standard 611.526(f)(13) subpart C, table for paragraph format; changed "Tecta 141.21(f)(3), E. coli EC/TC" to "Tecta EC/TC P-A Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Tecta EC/TC P-A Test" above in this Table 2. 141, appendix A to Added explanation of USEPA approval 611.526(f) Board note subpart C, table for of Standard Methods Online, Method 141.21(f)(6), E. coli 9223 B-04 as an approved alternative methods for E. coli; added explanation of omission of a separate listing for the Standard Methods Online versions; added explanation of USEPA approval of Tecta EC/TC P-A Test as an approved alternative method for E. coli. See the entry for 35 Ill. Adm. Code 611.526(f)(11) in Table 1 above. Added explanation of USEPA approval 611.531(a)(2)(A) Board 141, appendix A to subpart C, table for of Standard Methods Online, Methods note 141.74(a)(1), total 9221 A, B, and C-06 and 9223 B-04 as approved alternative methods for total coliforms coliforms; added explanation of omission of separate listings for the Standard Methods Online versions. See the entries for 35 Ill. Adm. Code 611.531(a)(2)(A)(i) and 611.531(a)(2)(A)(iii) in Table 1 above. 141, appendix A to Added explanation of USEPA approval 611.531(a)(2)(B) Board subpart C, table for of Standard Methods Online, Methods note 141.74(a)(1), fecal 9221 E-06 and 9222 D-06 as approved coliforms alternative methods for fecal coliforms; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(B)(i) and

611.531(a)(2)(B)(ii) in Table 1 above.

141, appendix A to Added explanation of USEPA approval 611.531(a)(2)(C) Board subpart C, table for of Standard Methods Online, Method note 141.74(a)(1), 9215 B-04 as an approved alternative heterotrophic bacteria method for heterotrophic bacteria; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.531(a)(2)(C)(i) in Table 1 above. Revised the tabular format to a standard 611.531(b)(1)(C)(ii) 141, appendix A to subpart C, table for paragraph format; added the ending 141.74(a)(2), free period. See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" chlorine above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(1)(C)(i) in Table 3 below. Added explanation of USEPA approval 611.531(b)(1) Board 141, appendix A to subpart C, table for of Hach Method 10260 as an approved note 141.74(a)(2), free alternative methods for free chlorine. chlorine See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(1)(C)(i) in Table 3 below. 611.531(b)(2)(D)(ii) 141, appendix A to Revised the tabular format to a standard subpart C, table for paragraph format; added the ending 141.74(a)(2), chlorine period. See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" dioxide above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(2)(D)(i) in Table 3 below. 611.531(b)(2) Board 141, appendix A to Added explanation of USEPA approval subpart C, table for of Hach Method 10260 as an approved note 141.74(a)(2), total alternative methods for free chlorine. chlorine See the entry for 35 Ill. Adm. Code 611.102(a), "Hach Method 10260" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(2)(D)(i) in Table 3 below.

611.531(b)(3)(A)(ii)

141, appendix A to subpart C, table for 141.74(a)(2), chlorine dioxide

Revised the tabular format to a standard paragraph format; added the ending period; changed the short-form method title from "ChlordioX Plus" to "ChlordioX Plus Test." See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(3)(A)(i) in Table 3 below.

611.531(b)(3) Board note

141, appendix A to subpart C, table for 141.74(a)(2), chlorine dioxide

Added explanation of USEPA approval of Hach Method 10260 and 9222 D-06 as approved alternative methods for fecal coliforms; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.102(a), "ChlordioX Plus" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.531(b)(3)(A)(i) in Table 3 below.

611.611(a)(2) Board note

141, appendix A to subpart C, table for 141.23(k)(1), antimony

Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for antimony; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(2)(D)(i) in Table 1 above.

611.611(a)(3) Board note

141, appendix A to subpart C, table for 141.23(k)(1), arsenic

Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for arsenic; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(3)(C)(ii) in Table 1 above.

611.611(a)(5) Board note	141, appendix A to subpart C, table for 141.23(k)(1), barium	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for barium; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(5)(D)(i) in Table 1 above.
611.611(a)(6) Board note	141, appendix A to subpart C, table for 141.23(k)(1), beryllium	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for beryllium; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(5)(D)(ii) in Table 1 above.
611.611(a)(7) Board note	141, appendix A to subpart C, table for 141.23(k)(1), cadmium	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for cadmium; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(7)(D)(i) in Table 1 above.
611.611(a)(9) Board note	141, appendix A to subpart C, table for 141.23(k)(1), chromium	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for chromium; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(9)(D)(i) in Table 1 above.
611.611(a)(10) Board note	141, appendix A to subpart C, table for 141.23(k)(1), copper	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for copper; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(10)(A)(ii) in Table 1 above.

611.611(a)(13)(A)(ii)	141, appendix A to subpart C, table for 141.23(k)(1), fluoride	Revised the tabular format to a standard paragraph format; added a comma after "D4327-97" and "D4327-03" and moving the conjunction "and" to before the new entry "D4327-11."
611.611(a)(13) Board note	141, appendix A to subpart C, table for 141.23(k)(1), fluoride	Added explanation of USEPA approval of ASTM D4327-11 as an approved alternative method for fluoride; added explanation of omission of separate listings for the Standard Methods Online versions.
611.611(a)(14) Board note	141, appendix A to subpart C, table for 141.23(k)(1), lead	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for lead; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(14)(A)(ii) in Table 1 above.
611.611(a)(16)(A)(ii)	141, appendix A to subpart C, table for 141.23(k)(1), lead	Revised the tabular format to a standard paragraph format; added a comma after "D3223-97" and "D3223-02" and moving the conjunction "and" to before the new entry "D3223-12."
611.611(a)(16) Board note	141, appendix A to subpart C, table for 141.23(k)(1), mercury	Added explanation of USEPA approval of ASTM Method D3223-12 as an approved alternative method for mercury.
611.611(a)(17) Board note	141, appendix A to subpart C, table for 141.23(k)(1), nickel	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for lead; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(17)(E)(i) in Table 1 above.
611.611(a)(18)(A)(ii)	141, appendix A to subpart C, table for 141.23(k)(1), nitrate	Revised the tabular format to a standard paragraph format; added a comma after "D4327-97" and "D4327-03" and moving the conjunction "and" to before the new entry "D4327-11."

611.611(a)(18) Board note	141, appendix A to subpart C, table for 141.23(k)(1), nitrate	Added explanation of USEPA approval of ASTM D4327-11 as an approved alternative method for nitrate; added explanation of omission of separate listings for the Standard Methods Online versions.
611.611(a)(19)(A)(ii)	141, appendix A to subpart C, table for 141.23(k)(1), nitrite	Revised the tabular format to a standard paragraph format; added a comma after "D4327-97" and "D4327-03" and moving the conjunction "and" to before the new entry "D4327-11."
611.611(a)(19) Board note	141, appendix A to subpart C, table for 141.23(k)(1), nitrite	Added explanation of USEPA approval of ASTM D4327-11 as an approved alternative method for nitrite; added explanation of omission of separate listings for the Standard Methods Online versions.
611.611(a)(20)(A)(ii)	141, appendix A to subpart C, table for 141.23(k)(1), orthophosphate	Revised the tabular format to a standard paragraph format; added a comma after "D4327-97" and "D4327-03" and moving the conjunction "and" to before the new entry "D4327-11."
611.611(a)(20) Board note	141, appendix A to subpart C, table for 141.23(k)(1), orthophosphate	Added explanation of USEPA approval of ASTM D4327-11 as an approved alternative method for orthophosphate; added explanation of omission of separate listings for the Standard Methods Online versions.
611.611(a)(22) Board note	141, appendix A to subpart C, table for 141.23(k)(1), selenium	Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for selenium; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(17)(E)(i) in Table 1 above.

611.611(a)(25) Board note

141, appendix A to subpart C, table for 141.23(k)(1), temperature

Added explanation of USEPA approval of Standard Methods Online, Method 2550-10 as an approved alternative method for temperature; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.611(a)(25) in Table 1 above.

611.612(f)(2) Board note

141, appendix A to subpart C, table for 143.4(b), iron

Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for iron; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.612(f)(2)(A)(ii) in Table 1 above.

611.612(f)(3) Board note

141, appendix A to subpart C, table for 143.4(b), manganese

Added explanation of USEPA approval of Standard Methods Online, Method 3113 B-10 as an approved alternative method for manganese; added explanation of omission of separate listings for the Standard Methods Online versions. See the entry for 35 Ill. Adm. Code 611.612(f)(3)(A)(ii) in Table 1 above.

611.645(b) Board note

141, appendix A to subpart C, table for 141.24(e)(1), 2,4-D, 2,4,5-TP (silvex), dalapon, dinoseb, glyphosate, pentachlorophenol, picloram Added explanation of USEPA approval of Standard Methods Online, Methods 6640 B-05 as an approved alternative method for 2,4-D, 2,4,5-TP (silvex), dalapon, dinoseb, pentachlorophenol, and picloram and Method 6651 B-06 as an approved alternative method for glyphosate; added explanation of omission of separate listings for the Standard Methods Online versions. See the entries for 35 Ill. Adm. Code 611.645(b) in Table 1 above.

141, appendix A to Revised the tabular format to a standard 611.802(c)(2)(A)(xii)subpart C, table for paragraph format; changed "Tecta 141.402(c)(2), E. coli EC/TC" to "Tecta EC/TC P-A Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Tecta EC/TC P-A Test" above in this Table 2. 141, appendix A to Added explanation of USEPA approval 611.802(c)(2)(A) Board subpart C, table for of Standard Methods Online, Method note 141.402(c)(1), E. coli 9221 F-06 and 9223 B-04 and Tecta EC/TC P-A Test as approved alternative methods for E. coli; added explanation of omission of a separate listing for the Standard Methods Online versions of Methods 9221 F-06 and 9223 B-04. See the entries for 35 Ill. Adm. Code 611.802(c)(2)(A)(i) and (a)(2)(A)(ii) in Table 1 above. Added explanation of USEPA approval 611.802(c)(2) Board 141, appendix A to subpart C, table for note of Standard Methods Online, Methods 141.402(c)(1), E. coli 9221 A. B-06 and 9223 B-04 and Tecta EC/TC P-A Test as approved alternative methods for total coliforms; added explanation of omission of a separate listing for the Standard Methods Online versions. See the entries for 35 Ill. Adm. Code 611.802(c)(2)(A)(vi) and (c)(2)(A)(viii) in Table 1 above. 611.1052(a)(5)(A) 141, appendix A to Added explanation of USEPA approval Board note subpart C, table for of Standard Methods Online, Methods 141.852(a)(5), total 9221 B-06 as an approved alternative coliforms method for total coliforms; added explanation of omission of a separate listing for the Standard Methods Online version. See the entries for 35 Ill. Adm. Code 611.802(a)(5)(A)(i) and (a)(5)(A)(ii) in Table 1 above. 611.1052(a)(5)(C)(ii) 141, appendix A to Revised the tabular format to a standard subpart C, table for paragraph format; changed "Colilert-141.852(a)(5), total 18®" to "Colilert-18® Test." See the coliforms entry for 35 Ill. Adm. Code 611.102(a),

"Colilert-18® Test" above in this Table

2.

611.1052(a)(5)(C)(vii)	141, appendix A to subpart C, table for 141.852(a)(5), total coliforms	Revised the tabular format to a standard paragraph format; changed "Tecta EC/TC" to "Tecta EC/TC P-A Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Tecta EC/TC P-A Test" above in this Table 2.	
611.1052(a)(5)(C) Board note	141, appendix A to subpart C, table for 141.852(a)(5), total coliforms	Added explanation of USEPA approval of Standard Methods Online, Method 9223 B-04, Colilert-18® Test, and Tecta EC/TC P-A Test as approved alternative methods for total coliforms; added explanation of omission of a separate listing for Standard Methods Online, Method 9223 B-04. See the entries for 35 Ill. Adm. Code 611.802(a)(5)(C)(i), (a)(5)(C)(ii), and (a)(5)(C)(iii) in Table 1 above.	
611.1052(a)(5)(D) Board note	141, appendix A to subpart C, table for 141.852(a)(5), total coliforms	Added explanation of USEPA approval of section 1 of Standard Methods Online, Method 9221 F-06 as an approved alternative method for <i>E. coli</i> ; added explanation of omission of a separate listing for Standard Methods Online, Method 9221 F-06. See the entries for 35 Ill. Adm. Code 611.852(a)(5)(D) in Table 1 above.	
611.1052(a)(5)(G)(ii)	141, appendix A to subpart C, table for 141.852(a)(5), <i>E. coli</i>	Revised the tabular format to a standard paragraph format; changed "Colilert-18®" to "Colilert-18® Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Colilert-18® Test" above in this Table 2. See the entry for 35 Ill. Adm. Code 611.852(a)(5)(G)(ii) in Table 1 above.	
611.1052(a)(5)(G)(vii)	141, appendix A to subpart C, table for 141.852(a)(5), <i>E. coli</i>	Revised the tabular format to a standard paragraph format; changed "Tecta EC/TC" to "Tecta EC/TC P-A Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Tecta EC/TC P-A Test" above in this Table 2.	

611.1052(a)(5)(G) Board note	141, appendix A to subpart C, table for 141.852(a)(5), total coliforms	Added explanation of USEPA approval of Standard Methods Online, Method 9223 B-04, Colilert-18®, and Tecta EC/TC P-A Test as approved alternative methods for <i>E. coli</i> ; added explanation of omission of a separate listing for Standard Methods Online, Method 9223 B-04. See the entries for 35 Ill. Adm. Code 611.802(a)(5)(G)(i), (a)(5)(G)(ii), and (a)(5)(G)(iii) in Table 1 above.
611.Appendix G, ¶ I.A.1c.	141, appendix A to subpart Q, ¶ I.A.1c.	Changed "State" to "the Agency."

Table 3: Board Housekeeping Amendments

Section	Source	Revision(s)
611.102(a), "Colilert-18®"	Board	Added the definition of the short-form method name.
611.102(a), "Colisure TM "	Board	Changed "Colisure Test" to "Colisure™ Test."
611.102(a), "Modified Colitag TM Test"	Board	Changed "Modified Colitag™ Method" to "Modified Colitag™ Test."
611.102(a), "ONPG- MUG Test"	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test."
611.102(b), AWWA, Standard Methods, 18th ed., Method 6651 B	Board	Corrected "Method 6651" to "Method 6651 B."
611.102(b), AWWA, Standard Methods, 18th ed., Method 9223	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure™ Test."
611.102(b), AWWA, Standard Methods, 19th ed., Method 6651 B	Board	Corrected "Method 6651" to "Method 6651 B."

611.102(b), AWWA, Standard Methods, 19th ed., Method 9223	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure™ Test."
611.102(b), AWWA, Standard Methods, 20th ed., Method 6651 B	Board	Corrected "Method 6651" to "Method 6651 B."
611.102(b), AWWA, Standard Methods, 20th ed., Method 9223	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test."
611.102(b), AWWA, Standard Methods, 20th ed., Method 9223 B	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test."
611.102(b), AWWA, Standard Methods, 21st ed., Method 9223	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test."
611.102(b), AWWA, Standard Methods, 21st ed., Method 9223 B	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; added a comma after "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test"; added a comma and the conjunction "and" after "Colisure TM Test"; added "Colilert-18® Test"; added "based on the particular medium used, available from IDEXX Laboratories, Inc."
611.102(b), AWWA, Standard Methods, 22nd ed., Method 9223 B	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; added a comma after "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test"; added a comma and the conjunction "and" after "Colisure TM Test"; added "Colilert-18® Test"; added "based on the particular medium used, available from IDEXX Laboratories, Inc."
611.102(b), Bran & Luebbe, Industrial Method #129-71W	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(b), Bran & Luebbe, Industrial Method #380-75WE	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.

611.102(b), CPI International, Inc., Modified Colitag TM Test	Board	Changed "Modified Colitag TM Method" to "Modified Colitag TM Test."
611.102(b), IDEXX Laboratories, Inc., Colisure TM Test	Board	Changed "Colisure Test" to "Colisure™ Test."
611.102(b), NTIS, USEPA Technical Notes Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(b), Standard Methods Online, Method 9230 B-04 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(b), USEPA Water Resource Center, USEPA Method 1600	Board	Removed "EPA" from the method title.
611.102(c), 40 CFR 3.2	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), 40 CFR 3.3	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), 40 CFR 3.10	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), 40 CFR 3.2000	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), 40 CFR 136.3(a)	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), appendix A to 40 CFR 136	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), 40 CFR 142.20(b)(1)	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.102(c), Subpart G of 40 CFR 142	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.

611.381(b)(1)(D)(iii)	Board	Renumbered the subsection to accommodate addition of new subsection $(b)(1)(D)(ii)$.
611.381(b)(1)(D)(iv)	Board	Renumbered the subsection to accommodate addition of new subsection (b)(1)(D)(ii).
611.381(b)(1)(D)(v)	Board	Renumbered the subsection to accommodate addition of new subsection $(b)(1)(D)(ii)$.
611.381(b)(1)(D)(vi)	Board	Renumbered the subsection to accommodate addition of new subsection $(b)(1)(D)(ii)$.
611.381(c)(1)(D)(ii)	Board	Removed the ending conjunction "or" to accommodate addition of new subsection (b)(1)(D)(ii).
611.381(c)(1)(D)(iv)	Board	Renumbered the subsection to accommodate addition of new subsection (c)(1)(D)(iii).
611.381 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.526(c)(4)	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test."
611.526(c)(5)	Board	Changed "Colisure Test" to "Colisure TM Test" (twice); changed "Autoanalysis Colilert System" to "Colilert® Test."
611.526(c)(5) Board note	Board	Changed "Colisure Test" to "Colisure™ Test."
611.526(f)(3)	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test"; changed "Colisure Test" to "Colisure TM Test."
611.526(f)(4)	Board	Changed "Colisure Test" to "Colisure TM Test"; changed "Autoanalysis Colilert System" to "Colilert® Test."
611.526 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.531(a)(2)(A)(iii)	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test."
611.531(a)(2)(A)(iii) Board note	Board	Changed "Colisure Tests" to "Colisure™ Tests."

611.531(b)(1)(C)(i)	Board	Moved "Standard Methods, 18th, 19th, 20th, 21st, or 22nd ed., Method 4500-Cl G" from subsection (b)(1)(C) to accommodate addition of subsection (b)(1)(C)(ii); added the ending semicolon and conjunction "or."
611.531(b)(2)(D)(i)	Board	Moved "Standard Methods, 18th, 19th, 20th, 21st, or 22nd ed., Method 4500-Cl G" from subsection (b)(2)(D) to accommodate addition of subsection (b)(2)(D)(ii); added the ending semicolon and conjunction "or."
611.531(b)(3)(A)(i)	Board	Moved "Standard Methods, 18th, 19th, 20th, 21st, or 22nd ed., Method 4500-ClO ₂ C or E" from subsection (b)(3)(A) to accommodate addition of subsection (b)(3)(A)(ii); added the ending semicolon and conjunction "or."
611.531 Board note	Board	Corrected "appendix A to 40 CFR 141" to "appendix A to subpart C of 40 CFR 141"; updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.600 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available (twice); corrected "appendix A to 40 CFR 141" to "appendix A to subpart C of 40 CFR 141."
611.611(a)(1)(A)(i)	Board	Ending conjunction "or" added to accommodate removal of 35 Ill. Adm. Code 611.611(a)(1)(A)(iii).
611.611(a)(1)(A)(ii)	Board	Ending period semicolon changed to a period and conjunction "or" added to accommodate removal of 35 Ill. Adm. Code 611.611(a)(1)(A)(iii).
611.611(a)(1)(A)(iii)	Board	Removed the method listing erroneously added to alkalinity in <u>SDWA Update</u> , <u>USEPA Amendments</u> (<u>January 1, 2011 through June 30, 2012</u>), R12-4 (Apr. 19, 2012).
611.611(a)(1) Board note	Board	Removed the explanation of the added method erroneously added to alkalinity in <u>SDWA Update</u> , <u>USEPA Amendments (January 1, 2011 through June 30, 2012)</u> , R12-4 (Apr. 19, 2012).
611.611(a)(11)	Board	Moved the former entire entry from 35 Ill. Adm. Code 611.611(a)(10) into this appropriate alphabetic position.

611.611 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available; corrected "appendix A to 40 CFR 141" to "appendix A to subpart C of 40 CFR 141."
611.612 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available (twice).
611.645 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.742(a)(1)(B)	Board	Added "former" before "Section 611.680." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(1)(C)	Board	Changed "Sections 611.310 and 611.680" to "Section 611.310 and former Section 611.680." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(2)(B)	Board	Added "former" before "Section 611.680"; added "former" before "Section 611.685." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(2)(C)(i)	Board	Added "former" before "Section 611.680"; added "former" before "Section 611.685." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(5)(A)	Board	Added "former" before "Section 611.685." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(5)(B)	Board	Added "former" before "Section 611.685." See the discussion of previously repealed provisions in the opinion above.
611.742(a)(6)	Board	Changed "having" to "that had" to reflect that the use of grandfathered data is intended. See the discussion of previously repealed provisions in the opinion above.
611.742(a) Board note	Board	Added explanation of the repeal of Sections 611.680 and 611.685. See the discussion of previously repealed provisions in the opinion above.

611.742(b)(1)	Board	Changed "must monitor" to "must have developed" and "must determine" to "must have determined" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(2)	Board	Changed "must develop" to "must have monitored" (twice) and "must conduct" to "must have conducted" (twice) to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(2)(A)	Board	Changed "must be" to "must have been" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(2)(B)	Board	Changed "must be" to "must have been" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(2)(C)	Board	Changed "must be" to "must have been" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(2)(D)	Board	Changed "must be" to "must have been" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(3)	Board	Changed "may elect" to "may have elected" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742(b)(3)(A)	Board	Changed "must determine" to "must have determined," "must also be" to "must also have been," "determines" to "must have determined," "is" to "was" (twice), "must approve" to "must have approved," and "approves" to "approved" to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.

611.742(b)(3)(B)	Board	Changed "has" to "had," "must determine" to "must have determined," "may use" to "may have used" (twice), "must determine" to "must have determined," "is" to "was" (twice), "must also be" to "must also have been," and "determines" to "determined," to reflect that compliance should have been completed in the past. See the discussion of previously repealed provisions in the opinion above.
611.742 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.802(c)(2)(A)(i)	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test."
611.802(c)(2)(A)(ii)	Board	Changed "Colisure Test" to "Colisure™ Test."
611.802(c)(2)(A)- (viii)	Board	Changed "Colilert-18®" to "Colilert-18® Test." See the entry for 35 Ill. Adm. Code 611.102(a), "Colilert-18® Test" above in this Table 2.
611.802 Board note	Board	Corrected "appendix A to 40 CFR 141" to "appendix A to subpart C of 40 CFR 141"; updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.883(d)(1)(B)	Board	Changed "Section 611.510" to "USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.883(d)(4)(D) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.883(d)(7)	Board	Added "by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.883(d)(4)(D) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.883 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.884(e) Board note	Board	Added explanation of the repeal of Section 611.685. See the discussion of previously repealed provisions in the opinion above.

611.884 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.901(a)(3)(D)	Board	Added "collected as required by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.901 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.907(a)	Board	Changed "under Section 611.510" to "by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.907 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.953(d)	Board	Corrected "Section 611.231" to "Section 611.531." See the discussion of erroneous cross-references in the opinion above.
611.953 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.955(b)(1)	Board	Corrected "Sections 611.231 and 233" to "Sections 611.531 and 611.533." See the discussion of erroneous cross-references in the opinion above.
611.955(b)(2)	Board	Corrected "Sections 611.231 and 611.233" to "Sections 611.531 and 611.533." See the discussion of erroneous cross-references in the opinion above.
611.955 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.956(a)(1)	Board	Corrected "Sections 611.231" to "Section 611.531." See the discussion of erroneous cross-references in the opinion above.
611.956 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.1004(b)(2)	Board	Changed "Autoanalysis Colilert System" to "Colilert® Test."
611.1004 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.

611.1052(a)(5)(C)(i)	Board	Changed "Colilert®" to the defined short-form method name "Colilert® Test."
611.1052(a)(5)(C)- (iii)	Board	Changed "Colisure®" to the defined short-form method name "Colisure TM Test."
611.1052(a)(5)(C)- (iii) Board note	Board	Changed "Colisure®" to the defined short-form method name "Colisure $^{\text{TM}}$ Test."
611.1052(a)(5)(C)- (iii)	Board	Renumbered the subsection to accommodate addition of new subsection $(a)(5)(C)(ii)$.
611.1052(a)(5)(C)- (iv)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(C)(ii); changed "E*Colite® test" to the capitalized defined short-form method name "E*Colite® Test."
611.1052(a)(5)(C)(v)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(C)(ii); changed "Readycult® 2007 test" to the capitalized defined short-form method name "Readycult® 2007 Test."
611.1052(a)(5)(C)- (vi)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(C)(ii); changed "Modified Colitag TM test" to the capitalized defined short-form method name "Modified Colitag TM Test"; added the ending conjunction "or."
611.1052(a)(5)(F)(ii)	Board	Changed "m-ColiBlue24® test" to the defined short-form method name "m-ColiBlue24® Test."
611.1052(a)(5)(G)(i)	Board	Changed "Colilert®" to the defined short-form method name "Colilert® Test."
611.1052(a)(5)(G)- (iii)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(G)(ii); changed "Colisure®" to the defined short-form method name "Colisure TM Test."
611.1052(a)(5)(G)- (iii) Board note	Board	Changed "Colisure®" to the defined short-form method name "Colisure $^{\text{TM}}$ Test."
611.1052(a)(5)(G)- (iv)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(G)(ii); changed "E*Colite® test" to the capitalized defined short-form method name "E*Colite® Test."

611.1052(a)(5)(G)(v)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(G)(ii); changed "Readycult® 2007 test" to the capitalized defined short-form method name "Readycult® 2007 Test."
611.1052(a)(5)(G)- (vi)	Board	Renumbered the subsection to accommodate addition of new subsection (a)(5)(G)(ii); changed "Modified Colitag TM test" to the capitalized defined short-form method name "Modified Colitag TM Test"; added the ending conjunction "or."
611.1052 Board note	Board	Added "and appendix A to subpart C of 40 CFR 141 (2014)."
611.1055(d)(2)	Board	Added the statement that was omitted on initial adoption in place of a provision marked "reserved" by USEPA. See the discussion of corrections to the RTCR in the opinion above.
611.1055 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.1061 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.Appendix G, ¶ I.A.1b., I.A.1c., I.A.2b., and I.A.2c.	Board	Corrected "141.860" to "611.1060" (seven times). See the discussion of corrections to the RTCR in the opinion above.
611.Appendix G, ¶ II.A.	Board	Changed "611.510" to "as required by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.Appendix G, ¶ IV.C.	Board	Changed "611.510" to "as required by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.Appendix G, endnote 14	Board	Changed "listed in 611.510" to "as required by USEPA pursuant to 40 CFR 141.40." See the discussion of previously repealed provisions in the opinion above.
611.Appendix G Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.

Table 4: Revisions to the Text of the Proposed Amendments Made in Final Adoption

Section	Source	Revision(s)
611 table fo contents, 611.527 heading	JCAR	Moved the entry into correct numeric postion.
611.102(a), "Colilert® Test"	JCAR	Added the comma after "21st ed." to complete offset of the parenthetical.
611.102(a), "Colilert-18® Test"	JCAR	Added the comma after "21st ed." to complete offset of the parenthetical.
611.102(b), ASTM, ASTM Method D3859-98 A and B	JCAR	Corrected the spelling "absorbtion" to "absorption."
611.102(b), ASTM, ASTM Method D3859-03 A and B	JCAR	Corrected the spelling "absorbtion" to "absorption."
611.102(b), ASTM, ASTM Method D3859-08 A and B	JCAR	Corrected the spelling "absorbtion" to "absorption."
611.102(b), Standard Methods Online Board note	Board	Removed the opening parenthesis mark from before "dalapon."
611.102(b), USDHS	JCAR	Corrected the indent level of the entry from the level of an individual method to the level of a method source.
611.102, USEPA, ORD, USEPA NERL Method 525.3	JCAR	Omitted the redundant appearance of "Method 525.3, Version 1.0" and the offsetting comma from the recitation of the method title.
611.130(a) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.130(b) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.130(c) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.

611.130(d) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.130(e) Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.130(f)(6)	Board	Changed "specified in either subsections (d)(1) through (d)(3) or (d)(4) through (d)(6) of this Section" to "specified in subsection (d)(6) of this Section and either subsections (d)(1) through (d)(3) or (d)(4) and (d)(5) of this Section." See the discussion of USEPA-suggested corrections above in this opinion.
611.130(f) Board note	USEPA, Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.381(b)(1)(A)-(ii)	JCAR, Board	Changed "gas chromatography, mass spectrometer" to "gas chromatography-mass spectrometer." See the discussion of JCAR queries above in this opinion.
611.381(b)(1)(A)- (iv)	Board	Changed "gas chromatography, mass spectrometer" to "gas chromatography-mass spectrometer."
611.381(b)(1)(B) Board note	USEPA	Corrected "Method 9221 B-07" to "Method 6251 B-07)."
611.381(b)(1)(D)(i)	JCAR	Corrected "19th or 21st ed." to "19, 21st, or 22nd ed."
611.381(d)(3)(A)- (ii)	JCAR	Added the missing ending period.
611.381(d)(4)(B) Board note	Board	Corrected the spelling "absorbtion" to "absorption."
611.526(c) Board note	JCAR	Changed "Methods 9221 A, B-06" to "Methods 9221 A and B-06."
611.526(f)(2)	JCAR	Corrected "19th ed., 20th, or 22nd ed." to "19th, 20th, or 22nd ed."
611.526(f) Board note	JCAR	Corrected "as approved an alternative method" to "as an approved alternative method."
611.531(a)(2)(B) Board note	USEPA	Corrected "Method 9222 E-06" to "Method 9221 E-06)."

611.531(a)(2)(D)- (vi)	IEPA	Removed "or AMI Turbiwell Method" to an independent subsection. See the discussion of IEPA-recommended revisions above in this opinion.
611.531(a)(2)(D)- (vii)	IEPA	Moved the AMI Turbiwell Method into this independent subsection. See the entry for 611.381(d)(3)(D)(vi) above in this table.
611.531(a)(2)(D)- (viii)	IEPA	Renumbered this subsection to accommodate movement of the AMI Turbiwell Method into an independent subsection. See the entry for 611.381(d)(3)(D)(vi) above in this table.
611.531(b)(4)	JCAR	Corrected "Method Method 4500- O_3 " to "Method 4500- O_3 ."
611.533(c)(1)	USEPA, Board	Added a comma and restored a formerly omitted comma to change "a supplier that uses both a surface water source or a groundwater source under direct influence of surface water and a groundwater source" to "a supplier that uses both a surface water source, or a groundwater source under direct influence of surface water, and a groundwater source" for enhanced clarity of USEPA's intended meaning in 40 C.F.R. 74(b)(6)(i). See the discussion of USEPA-recommended revisions to the amendments adopt in R14-8 above in this opinion.
611.533 Board note	Board	Updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.611(a)(2) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(3) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(5) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(6) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(7) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(9) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."

611.611(a)(10) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(13) Board note	JCAR	Corrected "an approved an alternative" to "an approved alternative."
611.611(a)(14) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(17) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(22) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.611(a)(25) Board note	Board	Corrected the spelling "temparature" to "temperature."
611.612(f)(2) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.612(f)(3) Board note	USEPA	Corrected "Method 9223 B-10" to "Method 3113 B-10."
611.645(a), toluene	JCAR, Board	Removed the duplicate entry; corrected "Method 524.3 (rev. 1.0)" in the text on file to "Methods 524.3 (rev. 1.0) and 524.4" to reflect the amendment made in <u>SDWA Update</u> , <u>USEPA Amendments (January 1, 2013 through June 30, 2013</u> , R14-8 (Jan. 23, 2014), slip or. at p. 205. ⁶
611.645(a), 1,2,4-trichlorobenzene	JCAR	Moved the entry into the appropriate alphabetic order.
611.645(a), 1,1,2-trichloroethne	JCAR	Moved the entry into the appropriate alphabetic order.
611.645(b), alachlor	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.

-

 $^{^6}$ The text of the amendments as published at 38 III. Reg. 21513, 21680 (Nov. 21, 2014) includes "and 524.4." The JCAR text and text on file do not.

611.645(b), atrazine	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), benzo(a)pyrene	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), chlordane	JCAR, Board	Changed "525.2 (rev. 2.0), and 525.3 (ver. 1.0)" to "and 525.2 (rev. 2.0); NERL Method 525.3 (ver. 1.0)" to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), di(2-ethylhexyl)adipate	JCAR	Added a comma before "525.2 (rev. 2.0)" to offset the element of the series.
611.645(b), di(2-ethylhexyl)-phthalate	JCAR, Board	Changed "525.2 (rev. 2.0), and 525.3 (ver. 1.0)" to "and 525.2 (rev. 2.0); NERL Method 525.3 (ver. 1.0)" to correct the formerly erroneous attribution of the method to USEPA Organic Methods. See the entry in Table 5 below.
611.645(b), endrin	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), heptachlor	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), heptachlor epoxide	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), hexachlorobenzene	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), hexachlorocyclopentadiene	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.

611.645(b), lindane	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), methoxychlor	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), PCBs (qualitatively identified as alachors)	JCAR, Board	Corrected "Arochlors" to "alachlors"; removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), penta- chlorophenol	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), simazine	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b), toxaphene	JCAR, Board	Removed "525.3 (rev. 1.0)" and the offsetting comma; added "NERL Method 525.3 (ver. 1.0)" offset by a semicolon to correct the formerly erroneous attribution of the method to USEPA Organic Methods.
611.645(b) Board note	JCAR, Board	Corrected "arochlors" to "alachlors."
611.732(b)(2)	USEPA, Board	Changed "the Agency may order more frequent monitoring" to "the Agency must require more frequent monitoring"; change "it" to iodine-131." See the discussion of USEPA-suggested correction above in this opinion.
611.732 Board note	Board	Changed "subsections (a) through (f) derive" to "derived"; updated the <i>Code of Federal Regulations</i> citation to the latest version available.
611.742(b)(3)(B)	JCAR	Changed "such systems" to "the systems."
611.802(a)(2)(D)	JCAR	Corrected "ground water" to "groundwater."

611.802(c)(2)(A)	JCAR	Corrected "Method Methods" to "Methods."
611.883(d)(7)	JCAR	Corrected "C.F.R." to "CFR."
611.883(h)(7)(A)- (ii)	JCAR, Board	Changed "level 1" to capitalized "Level 1" (twice).
611.883(h)(7)(A)- (ii)	JCAR	Chagned "although they have detected , they are not in violation" to singular "although it has detected , the supplier is not in violation."
611.884(e)	JCAR	Corrected "the references relates" to singular "the references relate."
611.901(a)(3)(D)	JCAR	Corrected "C.F.R." to "CFR."
611.907(a)	JCAR	Corrected "C.F.R." to "CFR."
611.956 <u>(d)(2)</u>	Board	Corrected "self assessment" to hyphenated "self-assessment."
611.Subpart AA heading	JCAR	Corrected the em-dash after "Subpart AA" to a colon.
611.1052(a)(5)(A) Board note	JCAR	Corrected "Method Method" to "Method."
611.1052(a)(5)(C) Board note	JCAR	Corrected "Method Method" to "Method."
611.1052(a)(5)(D) Board note	JCAR	Corrected "Method Method" to "Method."
611.1052(a)(5)(G) Board note	JCAR	Corrected the spelling "methoda" to "methods"; corrected "Method Method" to "Method."

Table 5: Requested Revisions to the Text of the Proposed Amendments Not Made in Final Adoption

Section Affected	Source of Request: Requested Revision	Explanation
611.102(a), "OGWDW Methods"	JCAR: Omitted "523 (rev. 1.0)" and its offsetting comma from the series without using overstrike.	The method designation "523 (rev. 1.0)" reflects text on file.

611.102(a), "USGS Methods" Board note	JCAR: Omitted the Board note without using overstrike.	The Board note reflects text on file.
611.102(b), Standard Methods 19th ed., Method 3125	JCAR: Added a listing for Method 3125 to the entry for Standard Methods, 19th ed.	The version of the method from the 19th edition is not approved by USEPA. See 40 C.F.R. 141.25(a) table, note 5.
611.102(b), ASTM, ASTM Method D2907-97	JCAR: Changed "1997" to "19971991" without using underlining and overstrike.	The year of method approval was 1997.
611.102(b), USEPA, NSCEP, USEPA OGWDW Methods, Method 536	JCAR: Added the entry for Method 536 to the listing for USEPA, NSCEP without underlining.	This entry does not reflect text on file, and the method is not available from USEPA, NSCEP—only from USEPA, OGWDW.
611.102, USEPA, ORD, USEPA NERL Method 525.3	JCAR: Changed the comma after the short-form method title to a colon without underlining and overstrike.	The comma reflects text on file.
611.381(b)(1)(A)- (ii)	JCAR: Should the comma after "purge and trap" change to a virgule? Should the comma in "gas chromatography, mass spectrometry" change to a virgule?	"Purge and trap" qualifies the type of approved gas chromatographymass spectrometry method. A hyphen or virgule is appropriate for a combined method, such as gas chromatography-mass spectrometry. See the discussion of JCAR queries above in this opinion.
611.531(a)(2)(A)(i)	JCAR: Removed the comma from before "or 22nd ed."	The Board prefers to use a comma to offset the final element of a series. See Chicago Manual of Style, 14th ed., ¶ 5.57, at p. 173.
611.531(a)(2)(A)-(ii)	JCAR: Removed the comma from before "or 22nd ed."	See the entry for 611.531(a)(2)-(A)(i) above in this table.
611.531(a)(2)(A)- (iii)	JCAR: Removed the comma from before "or 22nd ed."	See the entry for 611.531(a)(2)-(A)(i) above in this table.

611.531(a)(2)(A) Board note	JCAR: Changed the base text "Standard Methods, 22nd ed., Methods 9221 A, B, and C" to "standard Methods, 22nd ed., Methods 8221 A, B, and C" without underlining and overstrike.	"Standard Methods, 22nd ed., Methods 9221 A, B, and C" is correct, and it reflects the text on file.
611.531(a)(2)(B)(i)	JCAR: Removed the comma from before "or 22nd ed."	See the entry for 611.531(a)(2)-(A)(i) above.
611.531(a)(2)(C) Board note	JCAR: Changed the base text "Standard Methods, 22nd ed., Method 9215 B as an approved alternative method" to "Standard Methods, 22nd ed., Methods 9215 B as approved alternative methods" without underlining and overstrike.	"Methods, 22nd ed., Method 9215 B as an approved alternative method" is correct, and it reflects the text on file.
611.531(b)(1) Board note	JCAR: Changed the base text "Methods 4500-Cl" to "Methods 4500-Cl" without underlining and overstrike. ⁷	"Methods 4500-Cl" is correct, and it reflects the text on file.
611.531(b)(2) Board note	JCAR: Changed the base text "Methods 4500-Cl" to "Methods 4500-Cl" without underlining and overstrike.	See the entry for 611.531(b)(1) Board note above in this table.
611.531(b)(3) Board note	JCAR: Changed the base text "Method 4500-ClO ₂ " to "Method 4500-ClO ₂ " and "Methods 4500-ClO ₂ " to "Methods 4500-ClO ₂ " without underlining and overstrike (twice). ⁸	"Methods 4500-ClO ₂ " is correct, and it reflects the text on file.

-

 $^{^7}$ The chemical symbol for chlorine is "Cl." The chemical formula "CI" would represent a compound of carbon and iodine.

 $^{^8}$ The chemical formula for chlorine is "ClO $_2$." The chemical formula "ClO $_2$ " would represent a dioxide compound of carbon and iodine.

611.600(d)	JCAR: Changed the hyphens in "atomic absorption-furnace technique," "atomic absorption-gaseous hydride technique," "atomic absorption-direct aspiration technique," and "inductively coupled plasma-mass spectrometry" to en-dashes offset by spaces in "atomic absorption – furnace technique" (11 times) "atomic absorption – hydride technique" (three times), "atomic absorption-direct aspiration technique" (once), and "inductively coupled plasma – mass spectrometry" (five times) without use of underlining and overstrike.	The phrases "furnace technique," "hydride technique," and "mass spectrometry" are not subtitles for the methods or explanatory phrases. The furnace and hydride techniques are qualifiers for the types of atomic absorption method intended. The inductively coupled plasma-mass spectrometry method is a single method comprised of inductively coupled plasma and mass spectrometry. The hyphens in the text on file are more appropriate.
611.611(a)(4)	JCAR: Changed "Asbestos Method 100.1" to hyphenated "Asbestos Method-100.1" without use of underlining and overstrike.	The non-hyphenated "Asbestos Method 100.1" is the defined short-form method name, and it reflects the text on file.
611.611(a)(18)(A)- (ii)	JCAR: Changed the period after "D4327-03" to a period.	A comma is the appropriate punctuation for separating elements of a series.
611.645(b), di(2- ethylhexyl)- phthalate	JCAR: Added a comma before "525.2 (rev. 2.0)" to offset the element of the series.	The correction to attribution of the method obviates the comma. See the entry in Table 4 above.
611.645(b) Board note	JCAR: Changed "pentachloro- phenol" to "pentachlorophenyl" without use of underlining and overstrike.	The text on file recites "penta- chlorophenol."

I, John T. Therriault, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above opinion on February 19, 2015, by a vote of 4-0.

John T. Therriault, Clerk Illinois Pollution Control Board