

**Powell, Mark**

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**From:** Eastvold, Jonathan C. <JonathanE@ilga.gov>  
**Sent:** Friday, December 11, 2015 4:16 PM  
**To:** Powell, Mark  
**Subject:** R15-22

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We had a few questions about your proposed amendments:

Part 601:

- .102(b) 1) Why is the detailed description of the Chapter's organization required?
- .115(a) 2) Why is "NSF" omitted from this list of abbreviations?  
3) Don't these abbreviations stand for the standard-issuing organizations themselves, not the standards that these organizations issue?
- .115(b), ¶ starting "ASTM" 4) If the organizational names are being spelled out anyway, why set out abbreviations in (a)?

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Part 602:

- Generally 5) Would it be possible to add a cross-reference early in this Part to the Definitions section governing this Chapter?
- .104(c), 1st line 6) "The Agency shall confirm" → Confirm to whom?
- .104(f)(1) 7) Could you please add a phone number to this subsection?
- .106(a)(1) and (2) 8) "would extend an existing violation of the Act or Board rules" → What about IEPA rules?
- .107(a), 4th line 9) "...in the Board's or Agency's." → How should this sentence end?
- .109(e)(2), 3rd line 10) "under Title IV of the Act or regulations adopted under Title IV" → Could you please provide a cross-reference to these regulations?
- .117, 2<sup>nd</sup> line 11) "of the Act, Board regulation, or Agency regulation..." → Why is "regulation" singular?
- .119, 1<sup>st</sup> & 2<sup>nd</sup> lines 12) See #11. Why is "regulation" singular?
- .215(a) 13) Should 2 copies of everything, or just of the completed application, be submitted? We could read the sentence either way.
- .225(j) & elsewhere 14) Is there a reason that the ordering of "soil, groundwater, foundation" varies sometimes (e.g., "soil, foundation, groundwater")?
- .400(a) 15) "No person shall apply algicide..."; original agency version said "No person must apply algicide...". Which version does the Board prefer?
- .405, 1<sup>st</sup> line 16) "All applications...must contain, at a minimum" → why at a minimum?

- .410(b) risk"? 17) Would it be possible to cross-reference the standard for determining "high health risk"?
- .500(a) 18) "...when the application of the pesticide will have an effect" → how precisely is this determined? Measurable concentration as measured by whom? Are there more specific numerical guidelines that you could cross-reference here?
- .505(d)(1) 19) Is this correct as published in the *Register*?
- .505(e)(1) 20) "all water intakes for a distance of 20 miles" → Is this information available? During the fracking rulemaking, it was not believed to be.
- .510(a) 21) "The Agency must confirm" → Confirm to whom?
- .510(c) 22) Why not allow applications for extensions after 60 days?

Part 603:

- .103(f) 23) "...maintenance of the public water supply" → Do you wish to strike "public"?
- .103(g) 24) "in accordance with Board rules" → Could you please provide a cross-reference to the specific rules referenced?

Thanks again for your time and assistance.

Sincerely,

Jonathan Eastvold

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