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From: McGill, Richard To: Brown, Don

Cc: McCambridge, Michael; Fox, Tim

Subject: PC for R17-12

Date: Wednesday, August 30, 2017 11:24:57 AM

Hey Don!

I'm forwarding here an email message from Jonathan Eastvold of JCAR. Please enter the email message as a public comment in R17-12.

If you have any questions, please let me know. Thanks!

Richard R. McGill, Jr. Illinois Pollution Control Board **Senior Attorney** 312-814-6983 richard.mcgill@illinois.gov

Please consider the environment before printing this email

From: Eastvold, Jonathan C. [mailto:JonathanE@ilga.gov]

Sent: Thursday, August 24, 2017 2:22 PM

To: McGill, Richard < Richard. McGill@illinois.gov>

Subject: [External] 35 IAC 611/R17-12

Just finished going through the text of the latest exempt rulemaking. Here's what else we came up with:

- 1. Lines 544, 546, 1234-36: Sec. 611.101, "Best available technology", "Bin classification", Compliance History", "Subpart B system" (3 times) → Strike "of this Part?
- 2. Lines 639 and 641: Sec. 611.101, "CT": Why are there quotes around "residual disinfectant concentration" and "disinfectant contact time"?
- 3. Line 650: Sec. 611.101, " CT_{99} ": " CT_{99} for a variety of disinfectants and conditions appear..." \rightarrow Should that be "CT₉₉ values for..." or should the verb be changed?
- 4. Line 1645: Sec. 611.102(a), "Thermo-Fisher Discrete Analyzer" → Should "discrete analyzer" be capitalized both times it appears in this sentence?
- 5. Lines 1730, 1744, 1750, 1767: Sec. 611.102(a), "USEPA Organic Methods" and "USEPA Organic and Inorganic Methods", last lines of each paragraph: One of these paragraphs ends "or USEPA..." and the other ends "and USEPA..." → Are these both the correct conjunctions to use?
- 6. Line 1862: Sec. 611.102(b), American Society for Microbiology, Enterolert, Board Note, 9th line: should "superceded" be "superseded"?
- 7. Lines 3463, 3468, 3473, 3478: Sec. 611.102(b), ASTM, ASTM Method D1688-95 A or C, ASTM Method D1699-02 A or C, ASTM Method D1688-07 A or C, ASTM Method D1688-12 A or C: in the third line of each paragraph, test methods A and C are separated by an ampersand rather than the "or" we were expecting. Is this intended?
- 8. Lines 4175-76: Sec. 611.102(b), NEMI, USEPA Organic and Inorganic Methods, Methods for the

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Determination of Organic and Inorganic Compounds..., Vol. 1 \rightarrow Should the parenthetical beginning " (Methods 300.1..." be a separate sentence? If so, should it have a verb?

- 9. Lines 4209-4210: Sec. 611.102(b), NEMI, USEPA Radiochemistry Procedures, 2nd line: Should "EPA 520/5-84-006" be "EPA 520/5-84/006"? And should the parenthetical that appears to be the second sentence be freestanding?
- 10. Line 6966: Sec. 611.300(b): For zinc, should "5." be "5.0"?
- 11. Lines 6977-89: Sec. 611.300(d): Could the commas at the end of each subsection be changed to semicolons?
- 12. Line 7365: Sec. 611.330(h), Limitations Footnotes: Technologies for Radionuclides, Board Note: after notes d, e, and f there's a stray citation to "63 Fed. Reg. at 42036", which seems potentially superfluous since that table is referenced earlier in the note. Please advise.
- 13. Sec. 611.350: This Section uses three different organizational styles (i.e., formatting of headers, closing punctuation for subsections). Would it be possible to standardize?
- 14. Lines 7826-27: Sec. 611.351(e)(5): "such treatment" → Change to "that treatment" or "the treatment" or "it"?
- 15. Line 10349: Sec. $611.360(a)(4)(D) \rightarrow$ Why change "subsection" to "provision"?
- 16. Lines 15171-15177: Sec. 611.645, opening paragraph: can the semicolons be changed to commas?
- 17. Line 15189:
 - a. Sec. 611.645(b), Dibromochloropropane: Should it be "Methods 504.1" or "Method 504.1"?
 - b. Sec. 611.645(b): Did you mean to omit di(2-ethylhexyl)adipate?
- 18. Lines 17274-17288: Sec. 611.801(c)(1) through (8): Can the commas be replaced by semicolons?
- 19. Lines 17957 and 17970: Sec. 611.804(a)(1) and (b)(1): Can ", or" be changed to "; or"?
- 20. Sec. 611.APPENDIX H: Could you please remove the capitalization for federal subparts/sections/appendices?
- 21. Sec. 611.APPENDIX H, 1d: Should "violations" be capitalized?

Thanks in advance for your consideration. Hope all is well.

Jonathan

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