

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S RESPONSES TO FOLLOW-UP QUESTIONS POSED AT OCTOBER 17, 2017 HEARING a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Rex L. Gradeless  
Rex L. Gradeless  
Assistant Counsel  
Division of Legal Counsel

Date: November 1, 2017

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Springfield, IL 62794-9276  
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**THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER**

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602, 607 AND 611 )

**ILLINOIS EPA'S ADDITIONAL RESPONSES TO FOLLOW-UP QUESTIONS  
POSED AT OCTOBER 17, 2017 HEARING**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, ("Illinois EPA" or "Agency") by and through its counsel, and for its additional responses to follow-up questions posed at the October 17, 2017, hearing, states as follows:

- 1) During the October 17, 2017, hearing, the Agency was asked follow-up questions from the Pollution Control Board ("Board" or "PCB") and the public.
- 2) Some follow-up questions required additional time and/or research by the Agency. The Agency herein responds to those additional follow-up questions posed at the hearing and said responses are attached hereto as Exhibit A.

Wherefore, the Illinois EPA respectfully submits its responses to follow-up questions posed at the October 17, 2017 hearing.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Rex L. Gradeless  
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**EXHIBIT A – AGENCY’S ADDITIONAL RESPONSES TO FOLLOW-UP QUESTIONS**

- 1) PCB asked whether the current definition of “maximum containment level” affected the Agency’s responses to PCB’s prefiled questions 2 and 3.**

**AGENCY’S ADDITIONAL RESPONSE:**

The Agency does not propose a change to the existing definition of maximum containment level found in existing regulations at Section 611.101. The Agency’s proposed changes to Section 611.121 does not, and is not intended to, change the definition of maximum containment level defined in Section 611.101. Additionally, the definition of maximum contaminant level does not influence whether the narrative standards has been violated.

- 2) PCB asked the Agency to shed light on the Agency’s interpretation of “good practice” in its response to the PCB’s prefiled question 3:**

**AGENCY’S ADDITIONAL RESPONSE:**

Some community water supplies (“CWSs”) add chemicals (some of which are proprietary) to water for enhancing treated and distributed water. These chemicals are permitted by the Illinois EPA and are subject to third party review to ensure potability (e.g., NSF/ANSI Standard 60).

IEPA believes that a concentration greater than that required by good practice means chemicals should not be applied at a rate greater than needed based upon existing source water quality.

- 3) PCB asked whether the Agency could submit whatever forms the Agency has so far relating to the Agency’s response to the PCB’s prefiled question 12:**

**AGENCY’S ADDITIONAL RESPONSE:**

The Illinois EPA commits to submitting this form when available.

- 4) PCB asked the Agency to submit the M-56 Fundamentals document, referenced in the Agency’s response to CWLP’s prefiled question 1(b), into the record:**

**AGENCY’S ADDITIONAL RESPONSE:**

The Illinois EPA has provided one of its two copies of this document to the PCB. This copy was sent via regular U.S. mail on November 1, 2017.

- 5) PCB asked Agency to submit how many facilities were included in the 10%, and the sizes of those facilities, with respect to the Agency's response to CWLP's prefiled question 4:**

**AGENCY'S ADDITIONAL RESPONSE:**

803 water systems reported maintaining a free chlorine residual. 972 water systems reported use of a combined residual. 253 water systems reported less than 0.5 mg/l free residual in at least one sample collected for compliance with the revised total coliform rule. 346 water systems reported less than 1.0 mg/l combined residual in at least one sample collected for compliance with the revised total coliform rule.

Of the water systems reporting less than 0.5 mg/l free residual in at least one sample collected for compliance with the revised total coliform rule:

- 51 had a population less than 500;
- 77 had a population between 501 and 3,500;
- 42 had a population between 3,501 and 10,000;
- 71 had a population between 10,001 and 50,000; and
- 12 had a population greater than 50,001.

Of the water systems reporting less than 1.0 mg/l combined residual in at least one sample collected for compliance with the revised total coliform rule:

- 119 had a population less than 500;
- 129 had a population between 501 and 3,500;
- 58 had a population between 3,501 and 10,000;
- 33 had a population between 10,001 and 50,000; and
- 7 had a population greater than 50,001.

- 6) PCB asked the Agency to comment on the costs associated with the potential need to retrofit facilities to meet the automatic shutdown requirements related to the Agency's response to CWLP's prefiled question 12(e):**

**AGENCY'S ADDITIONAL RESPONSE:**

This section only applies to approximately 10 percent of the 1742 CWSs that meet proposed section 604.700(a). Most these CWSs already have continuous chlorine analyzers to comply with surface water treatment rule requirements. Most of the systems that have analyzers also have alarm capability, but it is estimated that no systems currently have the ability to automatically shut down the treatment process based upon a low chlorine residual.

An analyzer costs approximately \$5,000. Less than 100 CWSs will need to purchase an analyzer. Whether adding alarm capacity or automatic shut-down of the high service pumps, controls are estimated to be an additional \$500 per water plant. Based upon further discussion of the issue, the Agency proposes requiring alarm capability instead of automatic shut-down controls. This proposal is based upon most applicable systems already having alarm capability. Also, the shut-down controls could involve more than just high service pumps. If water systems decided to include low service and chemical feed pumps, the wiring and control costs would vary greatly

and could be expensive. The Illinois EPA proposes the following revision to proposed Section 604.730:

Section 604.730 Continuous Chlorine Analyzers

Community water supplies that rely on chlorination for disinfection pursuant to Section 604.700(a) ~~present in the source water~~ must have continuous chlorine residual analyzers ~~and other equipment that automatically shuts down the facility when~~ with alarm capability that alert the community water supply if chlorine residuals at the entry point to the distribution system are below the limits established in Section 604.725.

**CERTIFICATE OF SERVICE**

Rex L. Gradeless, Assistant Counsel for the Illinois EPA, herein certifies that he has served a copy of the foregoing NOTICE OF FILING, and ILLINOIS EPA'S ADDITIONAL RESPONSES TO FOLLOW-UP QUESTIONS POSED AT OCTOBER 17, 2017 HEARING, upon persons listed on the Service List, by placing a true copy in an envelope duly addressed bearing proper first class postage in the United States mail at Springfield, Illinois on November 1, 2017, or by sending an email from my email account (Rex.Gradeless@Illinois.gov) to the email addresses designated below with the following attached as a 7 page PDF document in an e-mail transmission on or before 5:00 pm on November 1, 2017.

By: /s/Rex L. Gradeless

**SERVICE LIST**

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