



545 S. Randall Rd., St. Charles, IL 60174
Ph: 866-521-3595

October 31, 2017

John T. Therriault, Clerk
Tim Fox, Hearing Officer
Illinois Pollution Control Board
100 West Randolph
Suite 11-500
Chicago, IL 60601

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STATE OF ILLINOIS
Pollution Control Board

P.C. # 7

RE: *In the Matter of Public Water Supplies: Proposed New 35 ILL. ADM. Code 604 Amendments to 35 ILL. ADM. Code Parts 601, 602, 607 and 611 R18-17 (Rulemaking – Water)*

Dear Mr. Therriault and Fox:

Thank you for allowing the Illinois Section American Water Works Association to respond to these recommended changes. We want to thank the IEPA drinking water staff for their excellent work and effort in updating these regulations. Water providers for years have had to review numerous documents to determine which rule applied this will simplify and help ensure water providers are following the most up to date rules.

As water providers, public health is our #1 concern and we take this very seriously. We are thankful for the effort put forward within this document. Several comments/concerns:

1. Section 601.115 b) The references to ASTM standards, AWWA standards, and NSF standards which are to be incorporated into the regulations by reference should not reference the year of the standard but only the "latest edition". If they want a list of references that they used to develop the regulations with dates that is fine, but to incorporate them in the regulations means that the regulations to be enforced are outdated. AWWA and ASTM are on five years cycles for updating standards. Many of the standards shown in the list have already been replaced.
2. Section 602.105 a) 3) the term "pilot study" is vague. Perhaps defining what constitutes a successful pilot study and who has the authority to establish the requirements. Some direction on how to establish a "pilot study" protocol.
3. Section 602.200 b) 4) Does not reference slip in liners? Spray on liners? Looking for some additional direction or perhaps this paragraph should be more general and only refer to the rehabilitation of water mains and only exempt pipe cleaning.



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4. Section 602.200 c) The addition of “and specification” basically requires all replacement projects get a permit. Any of these listed items will have a change in the details of their specifications even if you order the same pump model, etc. Just looking for clarification on the meaning of the change.
5. Section 602.310 and 602.325 references a Section 602.315. This section does not exist in the posted copy.
6. Section 604.105 a) It is unclear how this requirement applies to utilities that purchase water from others. Does the transmission system from the supplier to the purchaser have to be designed to deliver 20% more flow than the water service contract allows? Or is this intended to apply only to the water supply (wells) and treatment facilities.
7. Section 604.130 a) 2) Is the required monitoring at groundwater plants a grab sample residual or a continuous monitoring device?
8. Section 604.135 c)1)A) – For the boil order it is stated that the water supply notify all consumers to boil for five minutes all water used for cooking or drinking. The CDC recommends a rolling boil for 1 minute. Please elaborate on your reasoning why 5 minutes was selected.
9. Section 604.160 b) what constitutes “periodic safety training”? May you please provide clarification?
10. Section 604.170 b) “locks on access manholes must be provided”. Does this mean that all valve vaults must be locked? May you please provide clarification?
11. Section 604.725 Residual Chlorine – The current regulations require a free chlorine residual of 0.2 mg/l and a total residual concentration of 0.5 mg/l. The proposed rule raises the free to 0.5 mg/l and the total to 1.0 mg/l as a combined chlorine system
 - a. This is normally not a problem except in large buildings or locations where privately owned water mains were oversized. How can a water provider be expected to maintain chlorine residuals within these locations?
 - b. Well run water utilities that do not have nitrification issues and have lower total chlorine residuals in the far reaches of their systems see no benefits and possible taste and odor issues and higher TTHM’s which could be problematic
 - c. What problems has the IEPA seen for systems that feed chloramines that would require raising the total to 1.0



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12. Section 604.730 - The Proposed change states” Community Water Supplies that rely on chlorination for disinfection pursuant to Section 604.700 (a) present in the source water must have continuous chlorine analyzers and other equipment the automatically shuts down the facility when chlorine residuals at the entry point to the distribution system are below the limits established in Section 604.725.”
- a. Does this require all surface water plants to have their chlorine analyzer shut-down water production if the analyzer residuals fall below the proposed 0.5 ppm free or 1.0 ppm total residual?
 - b. At times Chlorine analyzers fail would it not be better to alarm rather than shut down and manually check residual then determine course of action.
 - c. We feel alarming rather than automatic shutdown would be acceptable for plants that have operators on staff.
 - d. If a chlorine analyzer fails and the control system shuts down their high service pumps this could culminate a system wide boil order due to a single analyzer failure.
13. Section 604.1410 b) 2) A) AWWA standard C905 has been discontinued and is no long in use. Larger pipes are now covered by C900.
14. Section 604.1410 b) 4) A) AWWA C900 covers larger size pipe and fabricated fittings up to 60 inch.
15. Section 604.1420 b) does not have provisions for transmission mains not interconnected with the distribution system. In those cases, the distance between valves may be as much as 4000 feet. May you please provide clarification?

Regards,

Illinois Section American Water Works Association
Water Utility Council

Members of the Illinois Section AWWA Water Utility Council

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Dennis	Duffield	Duffield Consulting Engineers, Ltd
John	DuRocher	Indian Head Park
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American Water Works Association
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