



November 13, 2017

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

Re: R2018-017 Proposed New 35 Ill. ADM. Code 604.725

The Central Lake County Joint Action Water Agency and its member communities who serve nearly 250,000 people, stand at the front line of defense assuring our water meets public health requirements. Often times living in the communities we serve, we field questions from friends, neighbors and citizens about their water. With regards to chlorine specifically, “why does my water smell like a swimming pool”? Or, “It says on your CCR that we have TTHM in our water. Should I be concerned?”

We are intimately aware of the critical role chlorine plays in our ability to protect public health. We are the individuals that purchase it, test it, specify and maintain the equipment that feeds it, determine the dose, constantly measure its residual at entry point and in our distribution systems, and report this information to those we serve and the IEPA. We test for chlorine disinfection by-products, we design, flush and make valve adjustments to minimize those DBPs and we report the results in our consumer confidence reports and to the IEPA. Our two most critical functions are to maintain pressure while meeting demand and maintenance of chlorine residual.

This is why one of the proposed updates to the Illinois Administrative Code is causing exceptional concern among our membership. In letters to the IPCB we asked several questions with regard to the proposed changes to 604.725. Though the ISAWWA and utilities have offered numerous comments to the proposed code updates, 604.725 stands above the rest in terms of combined potential public health, utility operation and cost impact. We have followed the testimony to date, have been researching the literature and reviewing our own operational data for insight on the impacts of this rule. Through this process it has become clear that more time, data collection, analysis and discussion are needed to give this matter the due diligence both it deserves and the public deserves.

In light of this, we respectfully proposed that the IEPA take the following approach:

1. Withdraw the proposed changes to 604.725.
2. Convene a stakeholders meeting in Springfield with the sole focus of this topic. At this meeting, each issue, concern and additional data need will be established.

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3. Allow stakeholders one-year to collect additional data and to research the established issues and concerns.
4. Elicit the assistance of the ISAWWA to hold a webinar to discuss progress at 6-month mark.
5. Convene a second stakeholders meeting in Springfield at the end of one-year period to discuss findings and to fill-in data gaps.

At the conclusion of the one-year period, this matter will have been thoroughly vetted and the IEPA would re-enter the rulemaking process for this item.

CLCJAWA, its Member Communities and the IEPA share the same goal of public health protection. We stand ready to work with the IEPA and all interested parties on this issue, to share our expertise and to come to a consensus on what is in the best interest of those we serve.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Soucie". The signature is written in a cursive style with a large, stylized initial 'S'.

William J. Soucie, M.S.
Operations Director