McGill, Richard
Brown, Don
<u>Fox, Tim</u>
docketing R18-17 PC
Wednesday, August 1, 2018 2:43:04 PM

Good afternoon, Mr. Clerk!

Please docket this forwarded email correspondence as a public comment in R18-17.

If you have any questions, please let me know. Thank you.

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

From: McGill, Richard
Sent: Wednesday, August 1, 2018 2:41 PM
To: 'Eastvold, Jonathan C.' <JonathanE@ilga.gov>
Subject: JCAR questions on 35 IAC 601.101(b)(3)

Good afternoon, Jonathan:

Thank you for your insightful questions on the proposed table at 601.101(b)(3). Your questions are repeated below (in bold) for convenience, followed by our responses:

- For Odor: Should there be a period after the three? It seems a bit confusing. What about "T.O.N. = 3" or something like that? USEPA's secondary MCL for odor reads "3" TON, not "3." TON. *See* 40 C.F.R. § 143.3. The Board's first-notice proposal of "3." TON reflects IEPA's rulemaking proposal and IEPA's existing rule (35 Ill. Adm. Code 654.403). I will have the Board's Clerk docket this email correspondence—your question is expected to elicit public comment from IEPA and others on this apparent ambiguity and how the level should read in the Board's rule.
- For Copper: Do you intend to have only one significant digit, or should the value be 1.0? USEPA's secondary MCL for copper reads "1.0" mg/L, not "1" mg/L. *See* 40 C.F.R. § 143.3. The Board's first-notice proposal of "1" mg/L reflects IEPA's rulemaking proposal, though IEPA's existing rule (35 Ill. Adm. Code 654.403) states "1." mg/L. Again, your question is expected to elicit public comment from IEPA and others on this apparent ambiguity and how the level should read in the Board's rule.

• Just noticed that (not counting odor) each of the secondary MCLs ends in a period. Is that necessary, or may we omit them? These periods are unnecessary. They are also potentially confusing—elsewhere in Part 601 and in the Board's rules generally, "mg/L" appears without a period.

If you have any other questions, please let me know. Thank you.

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

From: Eastvold, Jonathan C. [mailto:JonathanE@ilga.gov]
Sent: Tuesday, July 31, 2018 3:32 PM
To: McGill, Richard <<u>Richard.McGill@illinois.gov</u>>
Subject: [External] P.S. RE: Two questions about 35 IAC 601.101(b)(3)

Just noticed that (not counting odor) each of the secondary MCLs ends in a period. Is that necessary, or may we omit them?

From: Eastvold, Jonathan C.
Sent: Tuesday, July 31, 2018 3:28 PM
To: 'McGill, Richard' <<u>Richard.McGill@illinois.gov</u>>
Subject: Two questions about 35 IAC 601.101(b)(3)

Since this is an EPA initiative, are you accepting edits at Register publication?

If so, in the table at 601.101(b)(3):

- 1. For Odor: Should there be a period after the three? It seems a bit confusing. What about "T.O.N. = 3" or something like that?
- 2. For Copper: Do you intend to have only one significant digit, or should the value be 1.0?

Thanks in advance.

Jonathan

Jonathan C. Eastvold, Ph.D. Rules Analyst III Joint Committee on Administrative Rules Illinois General Assembly

700 Stratton Building Springfield, IL 62706

Tel.: 217-785-2254 JonathanE@ilga.gov

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