



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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THOMAS V. SKINNER, DIRECTOR

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STATE OF ILLINOIS
Pollution Control Board

August 27, 2001

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, IL 60601

R01-20
P.C. #3

Re: Illinois Environmental Protection Agency Comments for Docket R01-20 Radionuclides

Dear Ms. Gunn:

Please find enclosed comments pertinent to Docket R01-20, which contains identical in substance drinking water regulations for public water supplies. The Agency very much appreciates the opportunity to comment, and hopes that you will take these comments into consideration when promulgating the final rule.

The Board has requested comment on several items within the regulatory proposal. The Agency offers the attached comments on the regulation proposed by the Board, and would like to commend the Board on its proposal, and in specific, Mike McCambridge, on the timely and excellent work he has done to prepare the proposal and to address the needs of Region 5 USEPA so that they can participate in the Board's comment process. These regulations have been long-awaited by many Illinois public water supplies as a result of a prolonged rule making effort at the federal level. The prompt proposal and adoption of these regulations by the Board will assist those supplies in working toward compliance in a timely manner.

Should you have any questions or find that this information is not clear, please contact me for clarification.

Sincerely,

Ms. Lou Allyn Byus
Assistant Manager - Field Operations
Division of Public Water Supplies

Enclosure

GEORGE H. RYAN, GOVERNOR

SEP 07 2001

STATE OF ILLINOIS
Pollution Control BoardILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
REGARDING R01-20*f.c. #3*NPDWR for Radionuclides – Page 7 of the Opinion of the Board
Sections 611.130, 611.330, 611.331, 611.720, 611.731 and Appendices A, G and H

The Agency concurs with the Board's interpretation of "variance" and "exemption" as the federal definitions apply to Illinois rules. The Agency appreciates the inclusion of the reverse osmosis limitations note for clarity to the regulated community, and the discussion of effective dates, which will also assist the regulated community.

Spelling of Exceedence or Exceedance – Page 8 of the Opinion of the Board

The English language is a compilation of rules with a great many exceptions, many of which do not support the Latin derivation. (Example: "i" before "e" except after "c" – yet we spell neighbor, weight, neither, either, eight, and many other words in contradiction.) The Agency supports the spelling "exceedance", as it is found in the Encarta World English Dictionary. This spelling is most commonly used in many existing federal rules and guidance manuals, and has been used frequently in training materials prepared for the drinking water program. Please change all spellings of "exceedance" to be consistent.

Doubled Article – Page 9 of the Opinion of the Board

The Agency concurs with removal of the double article.

Subsection Cross-References – Page 9 of the Opinion of the Board

The Agency concurs with the Board's proposal to change all references of "below" or "above" to "of this Section", as it does provide clarity to the regulated community when interpreting complex and lengthy regulations.

Spelling of Antimony – Page 10 of the Opinion of the Board

The Agency concurs with the Board's proposal to correct the spelling of "antimony".