

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)

PRE-FILED TESTIMONY OF JUSTIN DEWITT

My name is Justin DeWitt. I am a licensed professional engineer in the State of Illinois and am a LEED accredited professional (Leadership in Energy and Environmental Design). I am currently the Chief of General Engineering at the Illinois Department of Public Health (IDPH) and have served in this position since December of 2004. In my position I oversee various environmental programs under the purview of IDPH and specifically, oversee the State of Illinois' Plumbing and Water Quality Program. I also serve as a technical advisor to the Director of IDPH and his subordinate staff for environmental health matters which involve engineering controls or public infrastructure. I supervise a subordinate staff of licensed and un-licensed engineers, plumbing inspectors and scientists whom collectively evaluate and investigate matters relating to population-based health, as well as, disease outbreaks, chemical accidents, toxic substance impacts, engineered designs and construction of public facilities regulated in whole or in part by IDPH.

My testimony serves to generally support the efforts of the Illinois Environmental Protection Agency (IEPA) in updating rules relating to the production and distribution of potable water in Illinois. The Illinois Plumbing Licensing Law, Plumbing Code, Plumber's Licensing Code, Plumbing Contractor Registration Code and Lawn Irrigation Contractor and Lawn

Sprinkler System Registration Code (225 ILCS 320; 77 IL Admin Code 890; 68 IL Admin Code 750; 77 IL Admin Code 894; 77 IL Admin Code 892, respectively) collectively serve to regulate the use of potable water produced by public and private water suppliers under the purview of IEPA. In consideration of the aforementioned responsibilities, IDPH is significant stakeholder in the outcome of IEPA's efforts to increase the safety of Illinois' potable water supplies, reduce regulatory overlap and update its standards and requirements to meet the needs of users connected to public and private water supplies.

In its role as the State's primary health agency, IDPH's Division of Environmental Health employs approximately 90 staff to implement regulations aimed at reducing the incidence of disease due to environmental factors. Significant resources at the state, county and local level are expended to supply potable water to citizens through compliant plumbing systems and to dispose of waste from buildings in a sanitary fashion. On an increasing pace, many of the outbreaks investigated by IDPH involve potable or domestic water systems as a contributing or causative factor in the origination and spread of disease.

In 2015, Illinois experienced its largest outbreak of *Legionnaires* disease at the Illinois Veterans Home in Quincy. This century old campus is served by a public water supply operating within the current parameters for disinfectant residual, however those parameters proved insufficient to prevent the colonization of the domestic water systems and the eventual proliferation of *Legionella* bacteria. 12 deaths and over 50 illings were associated with a two year long outbreak. Ultimately, the veteran's home installed a water treatment plant to retreat the water received from the public water supply in Quincy. This treatment plant uses, as a primary control methodology, a combination of sodium hypochlorite and chlorine dioxide. Due to the age and condition of the plumbing found on site, the minimal residual disinfectant found in the

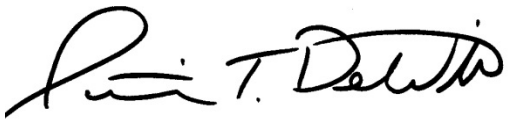
public water supply was found to be drastically ineffective. With total free residual chlorine at or above 1ppm throughout the domestic water system, the veteran's home has seen remarkable improvement in biological monitoring results across the campus. The veteran's home in Quincy is representative of the aging water infrastructure in Illinois.

IEPA has determined to increase the residual disinfectant levels required of public water supplies in order to improve and maintain water quality in plumbing systems. IDPH provides specific support to this proposed change as there are approximately 300 annual cases of *Legionellosis* in Illinois. Improving the disinfectant residual across the potable water systems is anticipated to have an effect on associated cases of illness.

Finally, IEPA's proposed rules clarify where the regulatory authority of the agency concludes and to clearly acknowledge where the regulatory authority of IDPH begins with respect to water mains, water services and backflow prevention devices. In so doing, IEPA's proposed rule addresses a standing concern held by the water supply and plumbing industry concerning regulatory overlap and perceived conflicts in the agencies rules. IDPH supports IEPA's proposal as it plainly identifies the statutory demarcation and division of responsibility.

IDPH respectfully submits this testimony in lieu of an appearance at hearing. Should the Board have questions or require additional information from IDPH, an appearance at hearing can be arranged.

Respectfully,

By: 

Justin DeWitt, P.E., LEED AP
Chief of General Engineering
Illinois Department of Public Health