

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)

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S RESPONSE TO PUBLIC COMMENTS SEVEN AND EIGHT a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Rex L. Gradeless
Rex L. Gradeless
Assistant Counsel
Division of Legal Counsel

Date: November 14, 2017

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER

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**ILLINOIS EPA’S RESPONSE TO PUBLIC COMMENTS
SEVEN AND EIGHT**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, (“Illinois EPA” or “Agency”) by and through its counsel, and for its response to public comments seven and eight, states as follows:

- 1) Public comment seven was filed (unsigned) on November 2, 2017, by the Water Utility Council, Illinois Section American Water Works Association.
- 2) Public comment eight was filed on November 3, 2017, by William J. Soucie on behalf of the Central Lake County Joint Action Water Agency.
- 3) The Illinois EPA responds to these public comments in the attached Exhibit A.

Wherefore, the Illinois EPA respectfully submits its response to public comments seven and eight.

Respectfully submitted,

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PROTECTION AGENCY

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EXHIBIT A – AGENCY’S RESPONSE TO PUBLIC COMMENTS SEVEN AND EIGHT

1) AGENCY RESPONSE TO PUBLIC COMMENT SEVEN:

Comment 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with dates that is fine, but to incorporate them in the regulations means that the regulations to be enforced are outdated.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 year cycles for updating standards. Many of the standards shown in the list have already been replaced.

Agency Response: This is not allowed under the Illinois Administrative Procedures Act (5 ILCS 100/5-75(a)).

Comment 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.

Agency Response: The term pilot study has been used in Illinois since the inception of the Agency. This term is also used by the Recommended Standard. The practice of the Agency is to evaluate what is needed for a pilot study on a case by case basis through consensus with respective consulting engineers. This is not a new or changed process from past practice.

Comment 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.

Agency Response: The Agency proposes the following change to the provision in Section 602.200(b)(4):

4) prior to rehabilitating a water main using ~~cured-in-place pipe a liner.~~

Comment 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.

Agency Response: The Agency does not agree with this interpretation. The items listed in Section 602.200(c) are those that do not require a construction permit and it is not the intention of the Agency to apply "specification" as described.

Comment 5: Section 602.310 and 602.325 references a Section 602.315. This section does not exist in the posted copy.

Agency Response: The Agency notes that there was no proposal to revise this Section hence it was not contained within the proposal.

Comment 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.

Agency Response: Yes, that is the intention. There is a need for all water system to have a greater amount of water available than that used during maximum average daily demand (e.g., should a major leak develop or in the event of large fire).

Comment 7: Section 604.130 a) 2) Is the required monitoring at groundwater plants a grab sample residual or a continuous monitoring device?

Agency Response: The Agency intended for this subsection to flexible and allow for benchtop or on-line testing.

Comment 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.

Agency Response: This proposed requirement is derived from existing Board regulation. The Agency believes that the five minute requirement avoids confusion relating to what constitutes a "rolling boil" (e.g., when the first bubble forms, when a stream of bubbles begins or when the water becomes highly agitated).

Comment 9: Section 604.160 b) what constitutes "periodic safety training"? May you please provide clarification?

Agency Response: The purpose of this subsection is to raise awareness of the issue/concern. Safety training is regulated by other state and federal regulatory programs.

Comment 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?

Agency Response: To add clarity, the Agency proposes the following edit to Section 604.170(b):
Fencing, locks on ~~manholes~~ tank access ~~manholes~~ hatches, or other necessary precautions must be provided to prevent trespassing, vandalism and sabotage.

Comment 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.**

Agency Response: With regard to the question provided in (a), the definition of water main means any pipe for the purpose of distributing potable water that serves or is accessible to more than one property, dwelling or rental unit and is exterior to buildings (see Section 601.105). A determination would have to be made as to whether what is being described is part of the water supply distribution system or plumbing. (Construction and operating permits for water mains can only be granted to community water systems.) Plumbing is not regulated under this Board regulation.

With respect to the statement provided in (b), the Agency would note that a well operated utility would not have significantly reduced chlorine residuals in the extremities of its system because water age would be managed. The Agency is not a proponent of increased chemical addition prior to the entry point of the distribution system. The Agency is a proponent of enhanced organic removal and better distribution system management (e.g., looping mains, enhanced flushing, tank mixers, etc.).

In regard to question (c), the Agency has noted in previous testimony that AWWA M56 indicates adequate control of nitrification in water supply distribution systems may require total residuals of 1.5 mg/l or greater.

Comment 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.**

Agency Response: The Agency notes that this issue has been raised by several commenters and has proposed the following change to Section 604.730:

CWSs that rely on chlorination for disinfection pursuant to Section 604.700(a) present in the source water must have continuous chlorine residual analyzers ~~and other equipment~~

~~that automatically shuts down the facility when~~ with alarm capability that alert the community water supply if chlorine residuals at the entry point to the distribution system are below the limits established in Section 604.725.

Comment 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.

Agency Response: The Agency proposes deleting Section 604.1410(b)(2)(A)(ii).

Comment 14: Section 604.1410 b) 4) A) AWWA C900 covers larger size pipe and fabricated fittings up to 60 inch.

Agency Response: The Agency proposes that Section 604.1410(b)(4)(A) be modified as follows:

A) PVC fabricated fittings 4 inch through ~~±~~ 60 inch shall conform to AWWA C900.

Comment 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?

Agency Response: In Section 604.1420(b), a provision for Section 604.145(b) is included for this purpose.

2) AGENCY RESPONSE TO PUBLIC COMMENT EIGHT:

Comment 1: 604.105 a) Satellite communities purchasing water from parent supplies should be exempted from this section.

Agency Response: The Agency does not agree. There is a need for all water system to have a greater amount of water available than that used during maximum average daily demand (e.g., should a major leak develop or in the event of large fire).

Comment 2: 604.120 b) recommends a color scheme that is different than the ANSI/ASME A13.1 pipe identification standard used in the United States. Suggest adopting this standard for consistency and to eliminate operator/maintenance mechanic confusion.

Agency Response: The Agency intended that the color scheme be consistent with the A13.1 Standard. Also, it is just a recommendation and any consist scheme is acceptable. The Agency would also like to reference the "Illinois EPA's Response to Curry's Prefiled Testimony" response to Comment 2:

The Agency concurs with the following proposed revision to Section 604.120:

a) Piping in a community water supply treatment facility shall be identified clearly by legends and color coding or the use of ~~color-coded~~ nametag labels

identifying the contents of individual pipes, spaced at intervals to allow convenient identification of individual pipes. A consistent standard shall be used throughout the system.

Comment 3: 604.130 a) 1) C) This section does not clearly state whether the equipment must be on-line. Please clarify. This section also appears to require ammonia monitoring. This is an unnecessary expense for many supplies including those on Lake Michigan. Ammonia is not detectable in Lake Michigan water and requiring equipment for its routine monitoring is an unnecessary expense. At most, suggest moving this requirement to 604.130 a) 2) d)

Agency Response: The Agency intended for this subsection to be flexible and allow for benchtop or on-line testing. Additionally, the Agency concurs that the ammonia requirement here should be stricken. Section 604.140(a) requires ammonia monitoring at appropriate community water systems.

Comment 4: 604.135 b) 3) Filters containing granular activated carbon cannot be disinfected with sodium hypochlorite because 1 - carbon removes chlorine and 2 - high levels destroy the chlorine. Suggest exemption for granular activated carbon with appropriate flushing and testing to verify bacteriological acceptability. Note that the inability to disinfect GAC is implicitly acknowledged in 602.310 b) where the filter must be disinfected prior to GAC addition.

Agency Response: The Agency acknowledges that this is an issue, and it is addressed in Section 602.310.

Comment 5: 604.135 c) 3) “any portion of the distribution system” should be further clarified to exempt pump and delivery station yard piping.

Agency Response: The Agency does not believe that this is necessary. However, Section 604.1210(e) should read as follows:

- e) Pumps taking suction from ground storage tanks shall be provided adequate net positive suction head, but the minimum distribution pressure of 20 psi is not required. The pumps shall be equipped with automatic shutoffs or low pressure controllers as recommended by the pump manufacturer.

Comment 6: 604.135 c) 3) C) This section calls for chlorine and turbidity testing at not more than hourly intervals in the affected area for “several hours” If “significant” decrease in chlorine residual or turbidity occurs... The terms “several” and “significant” allow for interpretation. Suggest replacing “several” with “four”. Suggest changing “significant” with “exceeds the minimum or maximum value in the historic record”.

Agency Response: The Agency took this language from existing Board regulations and will defer to the Board on this suggested change.

Comment 7: 604.135 d) Emergency Operations Plans should be declared confidential and not subject to FOIA as they can reveal system weaknesses and vulnerabilities. IEPA or similar agency should provide an Emergency Operations Plan template and guidance for utilities.

Agency Response: This is not a new requirement, and the Agency does not require water systems to supply emergency operations plans to the State. Specifically, the Illinois EPA, through its triennial inspection process, has been requiring CWSs to have emergency plans for at least the past 20 years. There are many template plans available. For example, the Illinois Rural Water Association (IRWA) has a very serviceable template. The Illinois EPA is also aware that the IRWA will also help in the preparation of plans for small CWSs.

Comment 8: 604.160 a) IEPA should provide utilities with a template chemical safety plan, otherwise there is no standard here.

Agency Response: The Agency is not attempting to establish a standard. The purpose of this subsection is to raise awareness of the issue/concern. The required content of chemical safety plans are covered by other state and federal regulatory programs.

Comment 9: 604.160 b) Safety training shall be further defined as “in accordance with applicable IDOL regulation”, otherwise there is no standard here.

Agency Response: The Agency is not attempting to establish a standard. The purpose of this subsection is to raise awareness of the issue/concern. Safety training is covered by other state and federal regulatory programs.

Comment 10: 604.165 d) How long shall records be retained, must provide a standard or state, “in perpetuity”.

Agency Response: Per the Illinois Environmental Protection Act (415 ILCS 5/15), copies must be maintained for ten years.

Comment 11: 604.220 calls for “Zebra” Mussel Control. Note that zebra mussels have largely been displaced from Lake Michigan for example, by Quagga Mussels. Suggest changing this section title to “Invasive Mussel Control” See <https://rvlakeguardian.wordpress.com/category/lake-michigan> for mussel survey results.

Agency Response: The Agency concurs with this recommendation and suggests the following edit:

Section 604.220 ~~Zebra~~ Invasive Mussel Control.

Comment 12: 604.605 b) Suggest adding the following to the end of the first sentence which provides a filtration rate cap, “unless filter performance in compliance with the appropriate water quality regulations is demonstrated”. This regulation, as written, results in the unnecessary and significant expenditure of public funds on additional capital, when it may be clearly documented over a prolonged period, that a higher filtration rate is

achievable. Other states recognize higher filtration rates as acceptable without threat to public health or recognize a L/d filtration ratio requirement.

Agency Response: The Agency believes that it would be appropriate to add a provision the following proposed Section 604.605(b) and Section 604.605(c).

- b) For community water supplies treating surface water, groundwater under the direct influence of surface water, or using lime soda softening treatment, unless otherwise approved by the Agency pursuant to Section 604.145(b), the nominal filtration rates shall not exceed 3 gal/min/sqftft² for single media filters and 5 gal/min/ft² for multi-media filters. Filtration rates shall be reduced when treated water turbidity exceeds the standards in 35 Il. Adm. Code 611.
- c) For community water supplies treating groundwater and not using lime soda softening treatment, unless otherwise approved by the Agency pursuant to Section 604.145(b), the rate of filtration must not exceed 4 gal/min/ft² of filter area.

Comment 13: 604.605 g) 4) D) iii) Please explain “periodic treatment of filter material for control of bacterial and other growth.” This is not a familiar concept.

Agency Response: The Agency believes that this provision could be removed.

Comment 14: 604.605 j) 6) Replace “Tapid” with “Rapid”.

Agency Response: The Agency concurs that this typographic error should be corrected and suggests the follow edit to Section 604.605(j)(6):

- 6) ~~Tapid~~ Rapid changes in backwash water flow must be prevented.

Comment 15: 604.720 c) Replace “in activation” with “inactivation”

Agency Response: The Agency concurs that this typographic error should be corrected and suggests the follow edit to Section 604.720(c):

- c) The methodology to determine ~~in-activation~~ inactivation of pathogens...

Comment 16: 604.725 a) I very strongly object to the changes proposed in this section. The minimum free chlorine residual should not be changed from 0.2 to 0.5 mg/L and total residuals should not be increased from 0.5 to 1.0 mg/L. This is an arbitrary change and is not supported with new research or established science. It will result in higher chlorine use, higher utility chemical costs, higher regulated disinfection by-products, increased customer taste and odor complaints, and the need by some utilities for larger chemical feed pumps and tankage. It will not improve public health and in fact, may threaten public health through increased DBP production and public confidence through increased chlorinous taste/odor in tap water. It is out of compliance with federal standards. Concern about the ability to accurately measure 0.2 mg/L chlorine levels may be addressed by restricting the

use of color wheels or comparators. Inexpensive monitoring equipment can easily, objectively and accurately measure chlorine residuals at this level.

Agency Response: The Agency does not agree.

Comment 17: 604.730 The requirement to shut down facilities when chlorine residuals at the entry point are below limits, is dangerous. Power surges/sags can cause process feedback loops to trip, chlorine monitors run out of reagent, probes fail, etc. The result of these relatively benign events suddenly shutting down a treatment process, will result in much larger water quality degradation events including filter turbidity breakthrough which can then cascade into filter-to-waste issues, pressure issues, etc.

Agency Response: The Agency notes that this issue has been raised by several commenters and has proposed the following change to Section 604.730:

CWSs that rely on chlorination for disinfection pursuant to Section 604.700(a) present in the source water must have continuous chlorine residual analyzers ~~and other equipment that automatically shuts down the facility when~~ with alarm capability that alert the community water supply if chlorine residuals at the entry point to the distribution system are below the limits established in Section 604.725.

Comment 18: 604.1145 a) This requirement does not specify the required water temperature and in essence, requires a water heater no matter what the source temperature may be. Suggest changing section to read “Source water temperature shall be sufficient to dissolve potassium permanganate”.

Agency Response: The Agency notes that this comment has been provided previously and would reference the “Illinois EPA’s Response to Curry’s Prefiled Testimony” response to Comment 53. The Agency proposes the following modification to proposed Section 604.1145

Potassium permanganate may be fed with gravimetric feeders or from batched solutions fed from day tanks. For batched solutions:

- a) the potassium permanganate added cannot exceed the solubility limits based upon temperature; and~~A source of heated water should be available for dissolving potassium permanganate.~~
- b) mechanical mixers shall be provided.

Comment 19: 604.1150 b) 2) The term “hydrofluosilicic acid” is a term no longer used widely. The CDC (<https://www.cdc.gov/niosh/ipcsneng/neng1233.html>) and NSF (https://www.nsf.org/newsroom_pdf/NSF_Fact_Sheet_on_Fluoridation.pdf) use the term “Fluosilicic Acid” as do some suppliers. Note that the NIH (<https://pubchem.ncbi.nlm.nih.gov/compound/11137276>) uses “Fluosilicic acid”. Suggest providing alternative names for clarification.

Agency Response: The Agency does not oppose this suggestion.

Comment 20: 604.1415 c) Please define a “dead end” in terms of length from flowing main.

Agency Response: The Agency does not believe that this is necessary. This requirement is not new to the regulations and dead end can be found in the Water Dictionary.

Comment 21: 604.1425 b) 1) It should be noted that this section cannot apply to large transmission mains. This exception may be addressed as it is in the section above, by stating “Unless otherwise approved by the Agency...”.

Agency Response: The Agency does not object to this adding the following provision to 604.1425(b)(1): Unless otherwise approved by the Agency pursuant to Section 604.145(b), water ~~Water~~ mains not designed to carry fire-flows must have flushing hydrants.

Comment 22: 604.1435 a) and b) Especially in Lake County, the requirement to keep all valve containing manholes dry is not possible without sump pumps. With hundreds of valve vaults, this is not feasible. If this is not the intent of this section, please clarify.

Agency Response: The Agency believes that this concern is taken into account by the statement in Section 604.1435(b) which indicates “... must be drained or be equipped with other means to remove standing water.”

Comment 23: 601.101 b) 2) The way this paragraph is written is confusing. Chlorine has a deleterious physiological effect. This paragraph states, literally, that it cannot be permitted to reach the consumer. Suggest clarification.

Agency Response: The Agency notes that this is an existing provision and has responded to the Board regarding this subsection in a previous response.

Comment 24: 601.105 Definition of Satellite Supply does not allow for that supply to feed phosphoric acid or other corrosion inhibitors as defined here. Is this international? It may be more cost effective in some situations for a satellite to treat their water, rather than a parent supply, when that parent supply serves many satellites that do not require corrosion inhibitors.

Agency Response: The Agency concurs with this observation and suggests the following revision to Section 601.105:

“Satellite supply” means any community water supply that purchases all finished water from another community water supply; does not provide any treatment other than chlorination or corrosion control; and distributes finished water to the consumers.

Comment 25: 601.115 c) How does a regulation like this stay current when it is corrected or improved? This section should state that the most current edition of the standard is used. If IEPA has a concern that they are then creating a regulation that they do not have control over, suggest language like “...or the most current edition of the standard at the discretion of the Agency.”

Agency Response: This is not allowed under the Illinois Administrative Procedures Act (5 ILCS 100/5-75(a)).

Comment 26: 602.310 c) and 602.310 c) 2) This section references Section 602.315. This section does not appear in the document.

Agency Response: The Agency notes that there was no proposal to revise this Section hence it was not contained within the proposal.

Comment 26: 602.310 d) Please confirming that single sample sets will no longer be permitted.

Agency Response: The Agency agrees that the proposal no longer considers a singles sample set. This approach is consistent with AWWA C651.

Comment 27: 602.325 d) Strike “is” from the phrase “...water supply that it is may not seek...”.

Agency Response: The Agency concurs that this typographic error should be corrected and suggests the follow edit to Section 602.325(d):

d) Upon issuance of a construction permit, the Agency may notify an eligible community water supply that it is may not seek a permit-by-rule if the community water supply has previously neglected to submit the information required by Agency or Board rules in the last two years.

CERTIFICATE OF SERVICE

Rex L. Gradeless, Assistant Counsel for the Illinois EPA, herein certifies that he has served a copy of the foregoing NOTICE OF FILING, and ILLINOIS EPA'S RESPONSE TO PUBLIC COMMENTS SEVEN AND EIGHT, upon persons listed on the Service List, by placing a true copy in an envelope duly addressed bearing proper first class postage in the United States mail at Springfield, Illinois on November 14, 2017, or by sending an email from my email account (Rex.Gradeless@Illinois.Gov) to the email addresses designated below with the following attached as a 14 page PDF document in an e-mail transmission on or before 5:00 pm on November 14, 2017.

By: /s/Rex L. Gradeless

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SERVICE LIST

<p>Office of the Attorney General 69 West Washington, St. Suite 1800 Chicago, IL 62706 mdunn@atg.state.il.us enviro@atg.state.il.us KPamenter@atg.state.il.us</p>	<p>Office of General Counsel Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702-1271 virginia.yang@illinois.gov eric.lohrenz@illinois.gov</p>
<p>Illinois Pollution Control Board 100 W. Randolph St. Suite 11-500 Chicago, IL 60601 Tim.Fox@Illinois.gov daniel.robertson@illinois.gov</p>	<p>Justin DeWitt, P.E. Chief of Gen. Engineering Illinois Department of Public Health 535 West Jefferson Springfield, IL 62761 justin.dewitt@illinois.gov</p>
<p>Janet Kuefler USEPA - Region 5 77 West Jackson Blvd. Chicago, IL 60601 kuefler.janet@epa.gov</p>	<p>Deborah J. Williams Regulatory Affairs Director Office of Public Utilities 800 East Monroe Springfield, Illinois 62757 deborah.williams@cwlp.com</p>
<p>Illinois Environmental Protection Agency 1021 North Grand Avenue East Springfield, Illinois 62794-9276 joanne.olson@illinois.gov Rex.Gradeless@Illinois.gov</p>	<p>Katy Khayyat DCEO 500 East Monroe Street Springfield, IL 62701 Katy.Khayyat@illinois.gov</p>