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STATE OF ILLINOIS  
Pollution Control Board  
P.C. # 21

November 22, 2017

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

Re: In the Matter Of Public Water Supplies: Proposed New 35 ILL. ADM. Code 604  
Amendments to 35 ILL. ADM. Code Parts 601, 602, 607, and 611 R18-1f (Rulemaking —  
Water)

Dear Mr. Therriault and Fox:

I am writing this letter as an interested party with over 23 years of operational experience in public water supplies, to request clarification on the new proposed section 604.1435:

**Section 604.1435 Valve, Meter and Blow Off Chambers**

- a) Valves, blow-offs, meters or other such appurtenances to a distribution system must be protected from standing water in the chambers, pits, or manholes.
- b) Chambers, pits or manholes containing valves, blow-offs, meters, or other appurtenances to a distribution system must be drained or be equipped with other means to remove standing water.
- c) The chambers, pits and manholes containing valves, blow-offs, meters, or other appurtenances to a distribution system must not connect directly to any storm drain or sanitary sewer.

From an operational standpoint for an existing water distribution system that has been in operation for over 100 years; I do not see how one can keep all the structures 'protected from standing water'. I ask for clarification on the expectations of the Board on how this is to be done and over what time frame would a CWS be allowed/required to complete such efforts.

For example, the Village of Wilmette is a smaller system with approximately 1,250 valves of various sizes – most are located in structures with an average age over 50 years. All of the structures take on surface and ground water from the watermain penetrations. To require that the Village take steps to protect all of these structures from standing water would be costly if required immediately or within a short period of time. Also, most valves are located in streets or roadways, so the inconvenience and disruption to residents and consumers is a concern.

I have looked into using spray lining to encapsulate the enclosure to eliminate inflow and infiltration into the structure and this cost is roughly \$4,000 per structure or a total of \$5 million

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dollars. Plus due to water coming in from the pipe penetrations, this is not a 100% reduction of inflow or infiltration. A program to pump out excess standing water on a twice yearly basis would require the expenditure of over 1,000 man-hours per year. Again, this is only twice per year, not 100% removal and would become an ongoing program forever.

So, my request is to clarify the time frame when this requirement will be required to be fully implemented and to what degree of standing water is to be removed

Respectfully,



Matt Overeem  
Superintendent of Water & Sewer