



DEPARTMENT OF WATER MANAGEMENT
CITY OF CHICAGO

January 5, 2018

John Therriault, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Suite 11-500
Chicago, IL 60601-3218

**Re: City of Chicago's Public Comment on In the Matter of: Public Water Supplies:
Proposed New 35 Ill. Adm. Code 604 and Amendments To 35 Ill. Adm. Code Parts
601,602, 607 And 611 (Docket No. R18-017)**

Dear Mr. Therriault:

The City of Chicago ("City") Department of Water Management ("DWM") submits the following post-hearing public comment to the Illinois Pollution Control Board ("Board") concerning the Illinois Environmental Protection Agency's ("Agency") rulemaking proposal entitled *In the Matter of: Public Water Supplies: Proposed New 35 Ill. Adm. Code 604 and Amendments To 35 Ill. Adm. Code Parts 601,602, 607 And 611*, Docket No. R14-20. The Board's procedural rules allow any person to submit a written post-hearing public comment during the period for such comment set by the hearing officer. 2 IAC 2175.505(b); 35 IAC 102.108(b).

DWM appreciates the opportunity to comment on this important proposal. DWM's comment is focused on the proposed changes to the Agency's public water supply residual chlorine requirement. While DWM does not oppose adjustments to the free and combined residual chlorine requirements, we are concerned that the proposal does not address a number of questions concerning compliance and monitoring of more stringent requirements.

The City owns and operates the world's two largest conventional water treatment plants with a combined capacity of 2,100 million gallons per day. These two plants serve the City, as well as 125 surrounding Illinois communities and provide water to 5.37 million people or almost half the population of Illinois. DWM's highest priority at all times is its mission to protect the public health of the customers it serves by delivering an adequate supply of exceptional quality water.

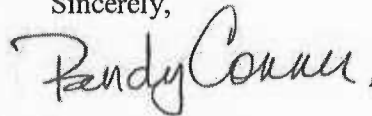
DWM urges the Board to fully consider the unintended consequences presented by increasing chlorine gas dosing to ensure 100% compliance with a 0.5 ppm minimum chlorine residual; specifically, including: (i) potentially increasing cancer-causing Disinfection By Products; and (ii) potentially increasing consumer exposure to lead (increasing chlorine gas dosing decreases pH which can increase corrosion of metals including lead).

Further, please be advised that the City of Chicago goes above and beyond minimum regulations to ensure Heterotrophic Plate Counts (HPCs) are done alongside chlorine measurements. HPC counts could be an alternative indicator protective of public health either in conjunction with, or separate from, than chlorine levels. The City of Chicago asks for amendment to the proposed changes allowing for an HPC measurement to be used as evidence of proper disinfection in cases where the chlorine residual is less than 0.5ppm. Specifically, allow compliance to be based on either a chlorine residual level of 0.5 ppm or an acceptable HPC count

The City of Chicago also requests that the Board provide clarification on compliance with the proposed changes. Compliance issues unanswered by the current proposal include: (1) Are TCR sites to be monitored? (2) Or, must compliance be demonstrated for any home sampled at any point? (3) Is a single location below 0.5 ppm considered non-compliance or is there an allowance such that, for example, exceedance of 5% of sites with chlorine residual below 0.5ppm considered non-compliance? More detail on these measurement issues would be helpful in determining compliance strategies.

DWM regularly works closely with the Agency's Division of Public Water Supply and looks forward to a continuing discussion on this issue. Please contact us for any additional information you may require.

Sincerely,



Randy Conner
Commissioner
Chicago Department of Water Management

cc: Service list for public comments (electronically)