

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	R14-8
SDWA UPDATE, USEPA AMENDMENTS	)	
(January 1, 2013 through June 30, 2013)	)	(Identical-in-Substance
	)	Rulemaking - Public Water Supply)

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S COMMENTS for the above captioned rulemaking, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Joanne M. Olson  
Joanne M. Olson  
Assistant Counsel  
Division of Legal Counsel

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**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

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**ILLINOIS EPA’S COMMENTS**

NOW COMES the Illinois Environmental Protection Agency, (“Illinois EPA” or “Agency”) by and through its counsel, and hereby submits its Comments for the above captioned rulemaking.

The Illinois EPA thanks the Illinois Pollution Control Board (“Board”) for its thorough review of Part 611 and incorporation of the recent federal amendments. The Agency’s comment in this rulemaking is related another Board rulemaking, R14-9. In R14-9, the Agency requested the Board amend Section 611.490 to allow for the use of laboratories certified by other primacy states in certain circumstances. See Proposed Amendments, R14-09, September 20, 2013. The Board issued its first notice Opinion and Order in R14-09 on December 19, 2013. In the first notice Opinion and Order, the Board included a discussion entitled “Parallel Certified Laboratory Provisions” which contained numerous amendments to sections in Part 611 (“parallel amendments”). See Op. and Ord., R14-09, December 19, 2013 at 6. These proposed parallel amendments were included in R14-09 to ensure consistency with the proposed amendment to Section 611.490.

This rulemaking, R14-8, includes a new parallel certified laboratory provision in Section 611.1052(b). In Section 611.1052(b), the Board proposes the following:

- b) **Laboratory Certification.** A supplier must have all compliance samples required by this Subpart AA analyzed by a laboratory that is certified by USEPA, the Agency, or a sister primacy state to analyze drinking water samples. The laboratory used by the supplier must be certified for each method (and associated contaminants) that is used for compliance monitoring analyses under this Subpart AA.

(Bd. Ord., R14-08, Nov. 7 2013, at 260). This parallel certified laboratory provision, however, does not contain the parallel amendment that will ensure consistency with proposed Section 611.490.

See R. 14-09. The Agency suggests that Section 611.1052(b) be amended to match the parallel amendments in R14-09, as follows:

- b) Laboratory Certification. A supplier must have all compliance samples required by this Subpart AA analyzed by a certified laboratory in one of the categories listed in Section 611.490(a)~~a laboratory that is certified by USEPA, the Agency, or a sister primacy state to analyze drinking water samples.~~ The laboratory used by the supplier must be certified for each method (and associated contaminants) that is used for compliance monitoring analyses under this Subpart AA.

WHEREFORE, The Illinois EPA respectfully submits these comments, and requests the Board to proceed expeditiously to Second Notice.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

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Assistant Counsel  
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**CERTIFICATE OF SERVICE**

Joanne M. Olson, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING and ILLINOIS EPA'S COMMENTS upon persons listed on the Service List by mailing, unless otherwise noted on the Service List, a true copy thereof in an envelope duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois on January 3, 2014.

/s/Joanne M. Olson  
Joanne M. Olson

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