

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	R15-
PUBLIC WATER SUPPLIES:)	
PROPOSED AMENDMENTS.)	(Rulemaking- Water)
TO 35 ILL. ADM CODE PARTS 601,)	
602, AND 603)	

NOTICE OF FILING

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board Illinois EPA's NOTICE OF FILING; APPEARANCE; STATEMENT OF REASONS; CERTIFICATE OF ORIGINATION; MOTION FOR ACCEPTANCE; and PROPOSED AMENDMENTS TO 35 ILL. ADM. CODE PARTS 601, 602 AND 603, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
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Date: May 8, 2015

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THIS FILING IS SUBMITTED ON RECYCLED PAPER

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APPEARANCE

The undersigned hereby enters her appearance as an attorney on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
Joanne M. Olson
Assistant Counsel
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STATEMENT OF REASONS

NOW COMES the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by and through its counsel, and hereby submits this Statement of Reasons to the Illinois Pollution Control Board (“Board”) pursuant to Sections 17, 27 and 28 of the Environmental Protection Act (“Act”) (415 ILCS 5/17, 27 and 28) and 35 Ill. Adm. Code 102.202 in support of the attached proposed regulations.

I. INTRODUCTION

The Illinois EPA proposes amendments to Subtitle F: Public Water Supplies. These amendments are intended to (1) update the existing rules in Parts 601, 602 and 603; (2) consolidate the community water supply permitting rules in Part 652 and 602; and (3) amend Part 603 to be consistent with amendments to the Public Water Supply Operations Act, 415 ILCS 45 (2015). These proposed amendments will provide clarity and certainty to community water supplies across the state, and the Illinois EPA recommends the Board accept its proposal for hearing.

II. REGULATORY PROPOSAL: PURPOSE AND EFFECT

The Illinois EPA proposes amendments to Parts 601, 602 and 603 to streamline the permitting process, to maintain consistency with the Public Water Supplies Operations Act, 415 ILCS 45, and to comply with the Illinois Administrative Procedure Act, 5 ILCS 100.

A. Permitting

The Agency seeks to reorganize Subtitle F to streamline the permitting requirements for community water supplies. Currently, the permitting regulations for community water supplies are contained in both Chapter I (Parts 601-620) and Chapter 2 (Parts 651-691) of Subtitle F. The Board's permitting rules are found in Part 602, and the Agency's permitting rules are found in Part 652. The Board's introduction and definitions for community water supplies are found Part 601, and the Agency's introduction and definitions are found in Part 651. With this rulemaking, the Agency intends consolidate the permitting rules into a single part—Part 602. Therefore, the Agency has integrated all of the requirements in Part 652 within the existing framework of Part 602. Many of the regulations in Part 602 and Part 652 were redundant, and in some cases the two parts had contradictory provisions. If the Agency's proposal is accepted and adopted by the Board, the Illinois EPA plans to repeal Part 652, Subparts A- F. The Agency plans to retain Subpart G, Public Water Supply Capacity.

Structurally and substantively, Part 602 and Part 652 differ. The Agency's Part 652 has regulations for the following types of permits: construction, operation, emergency, aquatic pesticide, and algicide. These permit requirements are spread over 6 different subparts. Part 602 is not broken into subparts, and does not have regulations for aquatic pesticide permits. In combining these two parts, the Agency proposes to add five subparts to Part 602. Proposed Subpart A of Part 602 is designed to be a general subpart that applies to all permit applications regardless of type. Subpart B contains information for construction permit applications. Subpart C contains information for operating permits. Subpart D contains information for algicide permits, and Subpart E contains information for aquatic pesticide permits other than algicide permits.

While it proposes splitting the permitting requirements for the different types of permits into individual subparts, the Agency does not propose dividing the standards of issuance found in Section 602.105 into different sections within the different subparts. Instead, the proposed regulations leave the standards of issuance for each type of permit in Subpart A, Section 602.105. In addition to containing the standards of issuance, proposed Subpart A includes the following: purpose, types of permits, capacity development, emergency permits, restricted status, critical review, right of inspection, permit fees, signature requirements, application forms, filing and final action by the Agency, permit duration, permit conditions, as-built plans, appeals, revocations, and limitations.

Proposed Subpart B of Part 602 contains information for community water supplies seeking to file a construction permit application. Many of the requirements in proposed Subpart B are currently found in Section 602.101, and Subpart A of Part 652. The first proposed section in Subpart B, Section 602.200, clearly sets forth the permit requirement for the construction of a community water supply. The Agency's proposal clarifies the types of documents that must be submitted with a construction permit application by adding details to the following proposed Sections: Section 602.210 Construction Permit Application, Section 602.225 Engineer's Report, Section 602.230 Design Criteria, Section 602.235 Specifications, and Section 602.240 Plans. These proposed sections contain general requirements that are applicable to all types of construction at community water supplies. Since there are different types of construction projects at community water supplies, the Agency's proposal also includes sections setting forth the unique information that must be included on applications for the following types of construction: source construction, treatment construction, storage construction and water main construction.

After construction at a community water supply is complete, the community water supply must obtain an operating permit from the Agency before it can operate any newly constructed portion of the community water supply. Proposed Subpart C of Part 602 contains application requirements for a community water supply seeking an operating permit. Many of the requirements in proposed Subpart B are currently found in Section 602.102, and Subpart B of Part 652. The information that must be submitted in an operating permit application is set forth in proposed Section 602.305. The Agency proposes different operating permit requirements for construction projects requiring disinfections than those projects not requiring disinfection. For those projects requiring disinfection, community water supplies must follow proposed Section 602.310 to demonstrate an absence of bacteria in the newly completed portions of the community water supply. The Illinois EPA also proposes allowing community water supplies to obtain partial operating permits in the event that all phases of construction are not completed at the same time.

In its revisions to Part 602, the Agency proposes moving the current Section 602.103 Algicide into a new Subpart D. The required contents of an algicide permit application are found in proposed Section 602.405; these requirements are based on the requirements in Section 652.502. The sampling requirements in proposed Section 602.410 are based on Section 652.503. The Agency has proposed amendments and updates while incorporating the algicide provisions of Part 652 into Part 602.

The Agency's regulations in Part 652 provide for the issuance of aquatic pesticide permits other than algicide. See Subpart F of Part 652. The Agency now proposes to include the requirements in Part 652, Subpart F in Part 602, Subpart E. The Agency has entitled this subpart "Other Aquatic Pesticides" to differentiate this subpart from Subpart D, Algicide.

As all of the substantive requirements of Part 652 except capacity development are included and updated in the Agency's proposed Part 602, the Agency plans repeal all of Part 652 except Sections 652.701 and 652.702 when this rulemaking has concluded. The purpose and effect of these changes will be to streamline and enhance the permitting process. Community water supplies will have a succinct, compact set of permitting regulations in Part 602, and will no longer have to consult Part 652. The Agency also believes these proposed amendments to Part 602 and the repeal of the majority of Part 652 will result in more efficient Agency review of permit applications.

B. Public Water Supplies Operations Act

On August 4, 2014, amendments to the Public Water Supply Operations Act became effective. P.A. 98-856 (S.B. 2770). Before these amendments, the Public Water Supply Operations Act required each community water supply to have on its operational staff at least one natural person certified as competent as a water supply operator. The recent amendments do not change this requirement, but introduces new terminology—the Responsible Operator In Charge (ROINC). The Public Water Supply Operations Act now specifies that the community water supply shall designate to the Agency a ROINC who directly supervises both the treatment and distribution facilities of the supply. 415 ILCS 45/1(1) (2014). To satisfy this requirement, the community water supply can have one ROINC who supervises the treatment and distribution facilities, or two ROINC's, one who supervises the treatment and a second who supervises the distribution facilities. Id.

Under the recent amendments to the Public Water Supply Operations Act, a ROINC is jointly accountable with the owner of the community water supply for the proposed operation of portions of the community water supply that he/she supervises. 415 ILCS 45/1.1(a). The

amendments also include the duties of the ROINC. 415 ILCS 45/1.1(b). These duties include: maintaining the necessary water supply operator certificate; supervising operation of the community water supply; and submitting consumer confidence reports, monthly operating reports, drinking water compliance monitoring results. The Board's current regulations in Part 603 do not use the ROINC terminology, and do not specify the duties of responsible personnel. The Agency's proposed amendments include the new term ROINC, and the ROINC's duties and responsibilities.

In addition to changes based on the recent amendments to the Public Water Supply Operations Act, the Agency proposes a new concept: administrative contact. Often, at community water supplies, a person other than the official custodian, the owner, or the ROINC will handle the day-to-day administrative tasks of the community water supply. The current structure of Part 603 does not recognize these individuals. To provide clarity to community water supplies and Agency personnel interacting with community water supplies, the Illinois EPA proposes Section 603.102, which provides that the owner or official custodian of a community water supply may designate an administrative contact on forms provided by the Agency. The Agency proposes that the administrative contact be treated as an agent of the owner or official custodian, and any notices provided by the Agency to the administrative contact be considered notice to the owner or official custodian.

C. Illinois Administrative Procedure Act

Currently, Part 601 of the Board's regulations do not contain a section for incorporation by reference. Therefore, the proposed amendments to Part 601 include a new section, Section 601.115, Incorporation By Reference. The Illinois EPA proposes to incorporate national standards published by the American Water Works (AWWA), American Society for Testing

Materials (ASTM), American National Standards Institute (ANSI), National Sanitation Foundation International (NSF), and Recommended Standards for Water Works (Recommended Standards). Many of the documents incorporated by reference contain design standards that the Illinois EPA proposes must be met before the issuance of a construction permit.

III. REGULATORY PROPOSAL: LANGUAGE

The following is a section-by-section summary of the Illinois EPA's proposal.

A. Part 601

The Agency proposes the following amendments to Section 601.101, 601.102, 601.104, and 601.105. The Agency proposes a new Section 601.115.

Section 601.101 General Requirements

The Agency's proposed amendments are non-substantive, housekeeping amendments. This section refers to the "Environment Protection Act" and the "Pollution Control Board". Both of these phrases are defined as the "Act" and the "Board" respectively in Section 601.105. Therefore, the Agency's proposed changes shorten these phrases to Act and Board.

Section 601.102: Applicability and Organization of this Chapter

Within Chapter I of Subtitle F, the Board includes regulations governing groundwater protection in Parts 615-620. The current applicability section, however, does not mention groundwater. Therefore, the Illinois EPA proposes adding "groundwater" to this section. Additionally, the Agency proposes adding a new subsection (b), which sets forth the organization of Chapter I, and an explanation of the contents of each part. This change prompted the Agency to propose adding "Organization of this Chapter" to the title of this Section.

Section 602.104 Analytical Testing

The Agency proposes to replace the list of analysis (physical, chemical, bacteriological and microscopic) with "monitoring and testing". Additionally, this section references the federal regulations found at 40 C.F.R. 141. Because the Board has adopted these federal National Primary Drinking Water Regulations in Part 611, the Agency proposes replacing the federal reference with a reference to Part 611.

Section 601.105 Definitions

The Illinois EPA proposes adding introductory language to clarify that these definitions only apply to Parts 601, 602, 603, and 607. The other parts of Chapter I, Subtitle F, have their own definition sections. The Agency also notes that it proposes to incorporate The Water Dictionary by reference; terms not specifically defined in proposed Section 601.105 or Part 611 will have the meaning in The Water Dictionary. The Agency proposes the addition of the following terms: aquifer property data, chlorine, community water supply, cross connection, hydraulic conductivity, hydraulic gradient, infrastructure, new community water supply, non-community water supply, porosity, public water supply, Responsible Operator In Charge, storage coefficient, transmissivity, water service line, well hydraulics, wellhead protection area, well head protection measures, well head protection program. Many of these terms are defined in Part 651 and used in the Agency's proposed amendments to Parts 602 and 603.

The Agency amends the following terms: certified laboratory, disinfectant, official custodian, service connection, supply. The term certified laboratory is updated by removing the reference to the Illinois Department of Nuclear Safety, which no longer exists. Within the definition of disinfectant, the Agency proposes changing the word "oxidant" to "agent." Illinois EPA proposes modifying the definition of official custodian to match the statutory definition in

Public Water Supply Operations Act, 415 ILCS 45. The Agency proposes adding language to the definition of service connection to clarify that water is supplied to the user through a water service line. Proposed changes to the definition of supply clarify that the supplies include community water supplies, not public water supplies.

The Agency proposes deleting the following terms: dose equivalent, gross alpha particle activity, gross beta particle activity, halogen, man-made beta particle and photon emitters, maximum residence time concentration, maximum total trihalomethane potential, recurring contamination, rem, total trihalomethanes, and trihalomethane. These terms are not used in the Agency's proposal, and the Illinois EPA does not believe they should be retained.

Section 601.115 Incorporation by Reference

The Illinois EPA proposes a new section to set forth the documents incorporated by reference, in accordance with the requirements of the Illinois Administrative Procedure Act, 5 ILCS 100/5-75. The Agency proposes incorporation of design standards published by the American Water Works (AWWA), American Society for Testing Materials (ASTM), American National Standards Institute (ANSI), National Sanitation Foundation International (NSF), and Recommended Standards for Water Works (Recommended Standards). The Water Dictionary is also published by AWWA. The documents proposed to be incorporated are set forth later in the Statement of Reasons. (See VII. Supporting Documents).

B. Part 602

The Illinois EPA proposes dividing Part 602, Permits, into five subparts. Proposed Subpart A contains the existing sections in Part 602 (general permit provisions). Subparts B-E are new. Subpart B contains construction permit provisions. Subpart C contains operating

permit provisions. Subpart D contains algicide permit provisions. Subpart D contains other aquatic pesticide permit provisions.

Subpart A

Much of the Agency's proposed Subpart A contains a combination of the existing regulations in Part 602 and similar requirements found in Part 652.

Section 602.101 Purpose

Section 602.101 is currently entitled Construction Permit. Because the Agency proposes a separate Subpart B for construction permit requirements, the Agency proposes repealing this section, and replacing it with a statement of purpose. The Illinois EPA proposes moving the content of the current section to proposed Section 602.200. The proposed purpose of Part 602, as stated in proposed Section 602.101, is to establish and enforce minimum standards for the permitting of community water supplies.

Section 602.102 Community Water Supply Permits

This Section is currently entitled Operating Permit. Because the Agency proposes a separate Subpart C for operating permit provisions, the Agency proposes repealing this section, and replacing it with an explanation of the different types of community water supply permits. The Illinois EPA proposes moving the operating permit content currently in this section to proposed Section 602.300.

Section 602.103 Public Water Supply Capacity Development

This Section is currently entitled Algicide Permit. Because the Agency proposes a separate Subpart D for algicide permit provisions, the Agency proposes repealing this section, and replacing it with a capacity development requirement as stated in the Act. 415 ILCS 5/15(b). All new community water supplies must demonstrate technical, financial and

managerial capacity as a condition for issuance of construction and operating permits by the Agency. The demonstration must be consistent with the Safe Drinking Water Act, 42 U.S.C. §300f, and regulations adopted by the Agency. The Illinois EPA proposes moving the current content of this section (algicide permits) to proposed Subpart D, Section 602.400.

Section 602.104 Emergency Permits

The Agency consulted Section 652.301 Permits Under Emergency Conditions when drafting amendments to this section. In subsection (a), the Agency proposes adding the official custodian and the ROINC to those who can obtain an emergency permit. Proposed subsection (b) lists emergency conditions where the Agency may issue an emergency permit. This list is taken from Section 652.301(a). In subsection (c), the Agency proposes deleting the word construction because the Agency can grant an emergency permit for activities other than construction. Proposed subsection (f) contains the Agency's contact information. Proposed subsection (g) states that emergency permits for water main extension have a fee, and the fee is due within 10 days from the day the emergency permit is issued. The fee is based on a statutory requirement in the Act, 415 ILCS 5/16.1.

Section 602.105 Standards of Issuance

This section currently provides standards of issuance for construction and operating permits, but does not provide standards of issuance for algicide and aquatic pesticide permits. Therefore, the Agency proposes combining subsections (a)-(c) into one subsection (a) containing the standards of issuance for construction and operating permits. The Agency incorporated the standards of issuance found in Section 652.111 when drafting amendments to subsection (a). Currently, the standards of issuance for construction and operation permits require the applicant to submit proof that the community water supply's construction conforms

to the design standards promulgated by the Agency or "other criteria that proves that will produce consistently satisfactory results." The Agency proposal identifies specific standards that it believes produces consistently satisfactory results, and incorporates these standards by reference. These include the Recommended Standard for Water Works, and standards developed by AWWA, ASTM, ANSI or NSF.

Proposed subsection (a)(4), based on Section 652.111(a)(3), provides that the Agency will not issue a construction permit unless a statement of ownership has been filed. Proposed subsection (a)(5), based on Section 652.111(c), provides instances when the Agency can issue construction permits to a community supply currently in violation of the Act, Board rules, or Agency rules. These instances include: the applicant has a variance or an adjusted standard; the construction permit is to alleviate or correct an existing violation; the permit is for a water main extension to serve those currently being served by a source of water violating the primary drinking water standards; or the permit is for the construction or installation of equipment necessary to produce water that is assuredly safe, as required by Section 601.101.

Proposed subsection (b) contains the standards of issuance for algicide and aquatic pesticide permits. An applicant must show that the algicide or aquatic pesticide will not cause a violation of the Act, Board regulation or Agency regulation. The Agency proposes to delete existing subsections (d) and (e), as these sections contained a sunset provision, expiring on December 8, 2009.

Section 602.106 Restricted Status

The Agency's rules on restricted status are found in Section 652.401 and Section 652.402. The Agency's proposed changes to Section 602.106 are based, in part, on Section 652.401 and 652.402. Illinois EPA's proposal also contains a non-exclusive list of the

violations that will place a community water supply on restricted status. These include violating a maximum contaminant level, treatment techniques, source water quantity requirements, loading rates, storage volume requirements and minimum pressure requirements. The Illinois EPA also proposes that the restricted status list no longer be published in the Environmental Register, but instead be published on Illinois EPA's webpage every three months. The Agency proposes deleting existing subsections (d) and (e), as these requirements are no longer applicable.

Section 602.107 Critical Review

Section 602.107 is currently entitled Signatory Requirement for Permit Applications. The Illinois EPA proposes moving the current requirements in this section to Section 602.110, and inserting into Section 602.107 regulations governing critical review. The Agency's proposed language is based on the Section 652.401 and Section 652.402. A community water supply is placed on the critical review list when the Agency's records indicate that the community water supply is approaching the point of violating the Act or Board regulations. The Agency proposes publishing the critical review list on its webpage at the same frequency as the restricted status list.

Section 602.108 Right of Inspection

This section is currently entitled Construction Permit Applications. The Illinois EPA proposes repealing this section because the Agency wants to consolidate the construction permit regulations in Subpart B of Part 602. The Agency proposes inserting regulations found in Section 652.114 Right of Inspection into Section 602.108. Under this proposed section, the Agency would be authorized to perform inspections in accordance with its authority under the

Act, including entering the community water supply at reasonable times, accessing records, inspecting equipment, obtaining water samples, and taking pictures.

Section 602.109 Fees

Current Section 602.109 contains regulations for operating permit applications. The Illinois EPA proposes repealing this section because the Agency wants to consolidate the operating permit regulations in Subpart C of Part 602. Now, the Agency proposes in Section 602.109 fee regulations setting forth the statutorily created fees. See 415 ILCS 5/16.1.

Section 602.110 Signatory Requirement for Permit Applications

This section is currently entitled Algicide Permit Applications. The Illinois EPA proposes repealing this section because the Agency wants to consolidate the algicide permit regulations in Subpart D of Part 602. The Illinois EPA proposes inserting the signatory requirement, currently in Section 602.107 into this section.

Section 602.111 Application Forms and Additional Information

In this section, the Board states that the Agency may adopt procedures requiring additional information, but the Illinois EPA intends to repeal its permitting procedures in Part 652 after the conclusion of this rulemaking. Therefore, Illinois EPA proposes that this language be modified to require additional information on a case-by-case basis, as necessary.

Section 602.112 Filing and Final Action by Agency on Permit Applications

The contents of this section are very similar to Section 652.109. The Agency consolidated the existing regulations for applications without a fee into subsection (a), and added a new subsection (b) for applications with a fee. The Illinois EPA must act on permits that require a fee within 45 days of receipt of the application and the required fee.

Section 602.113 Duration

The Illinois EPA's proposed changes to this section are intended to provide clarity, especially for the duration of construction permits. As proposed by the Agency in subsection (a), construction permits expire five years from the date of issuance if construction commences within one year of construction. If construction does not commence within one year, the construction permit expires, but may be renewed for additional one year periods. Similar duration requirements are found in Section 652.112.

The Agency's proposes adding subsection (d), which contains the duration of aquatic pesticides. These permits are valid for a fixed term not to exceed one year.

Section 602.114 Conditions

The Illinois EPA proposes non-substantive amendments to this section which are intended to clarify the language the Board currently has adopted.

Section 602.115 Design, Operation and Maintenance Criteria

In Section 602.115, the Agency proposes changing public water supplies to community water supplies.

Section 602.116 Requirement for As-Built Plans

In this section, the Agency requires as-built plans to be submitted if previous construction has been complete without construction permit issued by Illinois EPA. Currently, the Illinois EPA had discretion to require these plans, but now the Agency proposes that the community water supply must submit as-built plans, specifications and a construction permit application for any portion of a community water supply constructed without a construction permit application.

Section 602.117 Existence of Permit No Defense

Amendments to this section include adding the aquatic pesticide permit to the list of permits, and adding Agency's regulations as a type of violation that a permit will not be a defense.

Section 602.118 Appeal of Final Agency Action on a Permit Application

Currently, this section does not state that a permit applicant can appeal a permit denial by the Agency. Therefore, the Agency proposes language specifically stating that permit denials are appealable to the Board in subsection (a). The Agency also proposes including the statutory timeline, 35 days, for appeals in subsection (c). See 415 ILCS 5/40(a)(1).

Section 602.119 Revocations

The Illinois EPA proposed changes to this section are non-substantive, clean-up amendments.

Section 602.120 Limitations

Currently, this section lists other state agencies that issue other permits community water supplies may need to obtain. To avoid having to amend this section in the future for new permits or new agencies, the Agency proposes language that Illinois EPA permits will not relieve the community water supply from obtaining other permits required by law.

Subpart B

The new Subpart B proposed by the Agency includes all requirements that must be met by a community water supply when seeking a construction permit.

Section 602.200 Construction Permit Requirement

This section provides that a construction permit is required for the construction, change or addition of a community water supply. Construction permits must be obtained before

commencing construction, and prior to adding any new chemicals or changing the points of chemical application. Construction permits are not needed for the installation of service connections, replacement of hydrants and valves in the distribution system, repair of water mains, including replacement of existing water mains with equivalent size pipe in the same location, routine maintenance, replacement of chemical feeds, pumps, controls, filter media, softener resins, pipes and appurtenances, and installation of meters. All work performed on a community water supply, either permitted or not, must be done in accordance with accepted engineering practices.

As stated above, the current regulations in Section 602.101 have been moved to this section. Proposed Section 602.200 (a) and (d) are very similar to current Section 602.101, and proposed Section 602.200 (b) and (c) are based on Section 652.101.

Section 602.205 Preliminary Plans

The proposed language in this section is taken from Section 652.103 and slightly modified. A community water supply can submit preliminary plans to the Agency to expedite the review of subsequently filed construction permit applications. The Agency cannot issue a construction permit based on preliminary plans.

Section 602.210 Construction Permit Applications

In this section, the Agency lists all the information that must be included in a construction permit application. This information can include: general applicant information, engineer report summary of the design criteria, specifications, plans, specific information for the type of construction, purchase water contracts, technical, managerial and financial capacity evaluations, and applicant signature. The Agency consulted current Section 602.108, and Subpart A of Part 652 when drafting this section.

Section 602.215 Submission of Application, Plans and Specifications

The Illinois EPA proposes that two copies of completed application, plans and specifications be submitted to the Agency for review. This proposed requirement is consistent with the rules found in Section 652.102.

Section 602.220 Alterations

This new section is based on Section 652.108. Before making alterations to approved construction plans and specifications, a community water supply is required to ask the Agency for a supplemental construction permit. The Illinois EPA also includes an exception for minor changes that will not affect the location, capacity, hydraulic conditions, water treatment process, or sanitary or mineral quality of the water to be delivered.

Section 602.225 Engineer's Report

Under this proposed section, the Agency will be able to request an engineer's report from the community water supply. Situations where the Agency may ask for an engineer's report include, but are not limited to, the construction of a new community water supply, a new source location, or a new water treatment process. The required contents of the engineers report are set forth in proposed subsections (a) – (l).

Section 602.230 Design Criteria

Under proposed Section 602.210, the construction permit application must include a summary of the design criteria. Proposed Section 602.230 sets forth the information, when applicable, that must be included in the design criteria.

Section 602.235 Specifications

Under proposed Section 602.210, the construction permit application must include the specifications. Proposed Section 602.235 states further requirements that the specification

must meet, including having a professional seal and signature of an architect or an engineer.

This proposed section is based on Section 652.106

Section 602.240 Plans

Under proposed Section 602.210, the construction permit application must include plans. Proposed Section 602.240 sets forth the information that must be included on plans submitted to the Agency. Section 652.105 formed the basis for the proposed language in this section.

Section 602.245 Source Construction Applications

The necessary information that must be included in source construction applications is set forth in this proposed section. Proposed 602.245(a) states what information must be included on the application; proposed subsection (b) states what information must be included on the plans; and proposed subsection (c) states what information must be submitted on the plans.

Section 602.250 Treatment Construction Applications

The construction of treatment works is a specific type of construction permit application received by the Agency, and the Agency's proposed Section 602.250 lists the information that must be included for these types of applications. This proposed section requires that plans submitted for the construction of treatment facilities include all appurtenances, detailed hydraulic profiles of water flowing through the treatment systems, schematic plumbing for all structures and equipment, locations of sources of pollution, maximum flood levels, and security provisions..

Section 602.255 Storage Construction Applications

Another common type of construction permit received by the Agency is for the construction of water storage. The Agency proposes in Section 602.225 a specific list of information that must be included in the storage construction permit application. This includes plans showing the storage capacity, location, elevation piping, vents, overflows, safety appurtenance and sampling taps. For below ground storage, the plans must show the location of sources of pollution. For hydropneumatic tanks, the plans must show the bypass piping, access manhole, drain, sight glass, pressure gauge, pressure relief valve, air compressor and housing. The plans must also include information on how the proposed storage structure can be drained without causing the pressure in the distribution system to drop below 20 psi.

Section 602.260 Water Main Construction Applications

The most common type of construction permit application received by the Agency is for the construction of water mains. Proposed Section 602.260 includes specific information that must be included in construction permit applications. Proposed subsection (a) states what additional information must be included on permit applications, and proposed subsection (b) states what information must be submitted on the plans for water main construction applications.

Subpart C

The new Subpart C proposed by the Agency includes all requirements that must be met by a community water supply when seeking an operating permit. The Agency incorporated the Board's regulations currently found in Section 602.102 and Section 602.109, and Illinois EPA's regulations found in Subpart B of Part 652.

Section 602.300 Operating Permit Requirement

The Agency combined the current requirements in Section 602.101 and 652.201 into this new section. In proposed subsection (a), Illinois EPA updated the language in current Section 602.101 to require operating permits for all projects required to obtain a construction permit. Proposed subsections (b) and (c) are based on Section 652.201. These subsections provide that the community water supply must submit the operating permit application when the construction is complete, and shall obtain an operating permit before placing the project in service. This proposed section also includes subsection (d), which states that partial operating permits may be obtained pursuant to proposed Section 602.320. The Board's current rules do not address partial operating permits, but the Agency's rules at Section 652.205 allow such permits for water main extensions.

Section 602.305 Operating Permit

This proposed section contains the requirements for operating permit applications. The Agency incorporated the current Board requirements in Section 602.109 into this proposed section. The Illinois EPA updated the responsible operator terminology to Responsible Operator in Charge. The Agency also added a new subsection for applications for the operation of a well.

Section 602.310 Projects Requiring Disinfection

This section provides that satisfactory disinfection must be demonstrated before an operating permit will be issued when the completed construction is of a facility that produces, contains, treats or carries water that must be bacteriologically safe. The Board's current operating permit rules in Part 602 do not differentiate between projects requiring disinfection and projects not requiring disinfection. The Illinois EPA believes this distinction should be

included in the Board's rules because this requirement is currently in Part 652. The Illinois EPA based this section on the language in Section 652.203, but has included specific provisions for disinfection of a filter, membrane unit and ion exchange. The Agency also proposes language in subsection (c)(1)-(2) specifying where the representative samples must be taken to demonstrate satisfactory disinfection.

Section 602.315 Projects Not Requiring Disinfection

Projects not requiring disinfection include the installation of equipment that does not come into contact with finished water, including but not limited to chemical feeders, coagulation basins, and raw surface water transmission lines. This proposed section is based on Section 652.204.

Section 602.320 Partial Operating Permit

A construction permit may cover a project with multiple phases that are completed at different times. In these cases, the Agency may grant a partial operating permit if the community water supply submits information specifying which phases have been completed, an operating permit application, plans specifying the phases to be partially operated, and evidence of satisfactory disinfection, if required. As different phases of the construction project are completed, the community water supply has the option of obtaining partial operating permits for each phase. The language in this proposed section is based on Section 652.205.

Subpart D

The new Subpart D proposed by the Agency includes requirements that must be met by a community water supply when seeking an algicide permit. The Agency incorporated the Board's regulations currently found in Section 602.103 and Section 602.110, and Illinois EPA's regulations found in Subpart E of Part 652.

Section 602.400 Algicide Permit Requirement

This proposed section prohibits the application of algicide, copper sulfate, copper sulfate based products or copper sulfate chemical aids to any source of water used by a community water supply without a permit issued by the Agency. This proposed section is based on Section 602.103 and Section 652.501.

Section 602.405 Algicide Permit Application

Illinois EPA lists the required contents of algicide permit applications in proposed Section 602.405. This proposed section is based on Section 602.110 and Section 652.502. Information that must be submitted in an algicide permit application includes, but is not limited to: name of the ROINC supervising the algicide application; description of the algae problem, adverse effects of the algae on the water treatment process, past algae problem and past algicide treatments; whether any fish kills resulted from past algicide; location of body of water where the algicide will be applied, amount of copper sulfate to be used; and time interval between treatments.

Section 602.410 Sampling

Under this proposed section, the owner, official custodian or authorized delegate of the community water supply must collect samples every time an algicide is applied. Proposed subsection (a) states the times and locations when the samples must be taken. Proposed subsection (b) requires that the samples be analyzed by a certified laboratory. This proposed section is based on Section 652.503.

Section 602.415 Required Permit Modification

Under this proposed section, a community water supply must modify its algicide permit if the community water supply has had a major change in the operation of the supply or the

algae growth which affects the use of the algicide, copper sulfate, copper sulfate based products, or copper sulfate chemical aids.

Subpart E

The new Subpart E proposed by the Agency includes all requirements that must be met by a community water supply when seeking an aquatic pesticide permit other than an algicide permit. The Board does not currently have regulations for aquatic pesticide permits. The Illinois EPA's regulations found in Subpart F of Part 652 form the basis of this proposed subpart.

Section 602.500 Other Aquatic Pesticide Permit Requirement

Under this proposed section, aquatic pesticides cannot be applied to a body of water used as a drinking water source without a permit issued by the Agency if the application will result in a measurable concentration of the pesticide in the intake water. Additionally, before an aquatic pesticide can be applied within 20 miles upstream of an intake, a permit must be obtained. This proposed section is based on Section 652.601

Section 602.505 Other Aquatic Pesticide Permit Application Contents

The Agency's proposal lists the required contents of an aquatic pesticide permit in proposed Section 602.505. This section is based on Section 652.602, and requires the following information: reason for the application, applicant information, applicator information, information about the pesticide to be applied, time and location of treatment, inventory of all species, size and population of animals or plants to be controlled, evidence of contacts with downstream water users, the application process, precautions to be taken, water characteristics, water chemistry, dosage and concentration of pesticide, and stream or impoundment data.

Section 602.510 Permits under Public Health Related Emergencies

This proposed section allows the Agency to issue an aquatic pesticide permit by telephone when there is an emergency. This section is based on Section 652.603.

Section 602.515 State Agency Programs

Under Section 652.604, the Department of Public Health, and Department of Natural Resources, and the Department of Agriculture may place on file with the Agency information required in the aquatic pesticide permit application. The Agency anticipates these state agencies will continue to apply for aquatic pesticide permits, and therefore now proposes in Section 602.515 language similar to Section 652.604

Section 602.520 Extension of Permit Duration

In the event a community water supply is unable to apply the aquatic pesticide as stated in the aquatic pesticide permit, proposed Section 602.520 provides a mechanism for the community water supply to seek an extension. The extension request must be in writing, list the reasons why the pesticide was not applied as stated in the permit, and state the new date for pesticide application. The Agency proposes allowing telephone requests, so long as it is followed up by a written request. The contents of this proposed section were based on Section 652.605.

C. Part 603

The Agency proposes amendments to the following sections in Part 603: 603.101, 603.102, 603.103, 603.104, 603.105.

Section 603.101 Ownership

In this section, the Agency proposes changing "public" water supply to "community" water supply. The Agency also proposes using "Responsible Operator in Charge" in the place of the "responsible personnel" language.

Section 603.102 Administrative Contact

The Agency proposes repealing this section because this section is no longer necessary. The recent amendments to the Public Water Supply Operations Act (P.A. 98-856) use the term "Responsible Operator in Charge," and the Agency no longer uses the term "responsible personnel."

In place of the repealed text, the Agency believes a new class of individual should be recognized: the administrative contact. This person is designated by the owner or official custodian to be the "agent" of the community water supply. In some large community water supplies, the owner or official custodian may not be directly involved with the day-to-day administrative responsibilities of running the community water supply. Therefore, the Agency requests that the Board include proposed Section 603.102, which would allow a community water supply to designate an agent who can act on behalf of the owner or official custodian.

Section 603.103 Responsible Operator In Charge

This section is currently entitled "Certified Operator". The Agency has proposed to retitle this section to match the new terminology in the Public Water Supply Operations Act: Responsible Operator in Charge. The proposed amendments to this section are designed to match the statute at 415. ILCS 45/1.1.

Section 603.104 Exempt Community Water Supplies

This section is currently entitled "Registered Person In Responsible Charge". The concept of a Registered Person in Responsible Charge was removed from the Public Water Supply Operations Act, and now every community water supply unless specifically exempt by the statute must have a Responsible Operator in Charge. In proposed Section 603.104, the Agency proposes to list those community water supplies exempt from the Responsible Operator in Charge requirement, as provided in 415 ILCS 45/9.1.

Section 603.105 Notification of Change of Ownership or Responsible Operator in Charge

The Agency's proposed changes to this section are non-substantive, and are intended to clarify the existing language. The owner and ROINC must notify in writing the Agency when there has been a change of ownership or the Responsible Operator in Charge within 15 days after any change.

IV. TECHNICAL FEASIBILITY AND ECONOMIC REASONABLENESS

Section 27(a) of the Act requires the Board to consider the technical feasibility and economic reasonableness of all substantive rulemakings. The proposed regulations do not require the installation of any particular technology, but instead seeks to streamline the permitting rules into one Part, and update the Board's rules to be consistent with recent statutory changes. Because the proposed regulation does not require the installation of any particular drinking water treatment technology, it is difficult to quantify the economic costs associated with compliance. The Illinois EPA believes the proposed rulemaking will lower the previous compliance costs, as it believes these proposed amendments consolidate the pertinent permitting requirements in one Part, making compliance easier. The proposed rules will provide more clarity, while not modifying the permitting standards currently in place. This will

provide an economic benefit to both the regulated community and the people of the State of Illinois. The Illinois EPA believes the proposed rules are technically feasible and economically reasonable.

V. AFFECTED FACILITIES AND OUTREACH

The Illinois EPA regulates 1,744 community water supplies. These water supplies utilize groundwater and surface water sources of potable water. Approximately, 1,006 community water supplies use groundwater sources, and 98 use surface water sources or groundwater sources under the direct influence of surface water. Seven community water supplies use both ground and surface water sources, and 652 community water supplies purchase water from other community water supplies. A total of 11,966,511 persons are served by these systems in Illinois. Water delivery can vary greatly. A very small community water system such as Stratford West Apartments near Macomb, Illinois produces on average 2,500 gallons per day. The City Chicago is capable of delivering over two billion gallons of water per day and routinely produces on average 510 MGD.

The Illinois EPA anticipates that all community water supplies in the State of Illinois will be affected by these proposed rules. The Agency believes the impact will be positive. The substantive requirements for permitting and responsible personnel are not changing. The Agency is hopeful that these proposed amendments will provide the regulated community with a concise, yet thorough, set of regulations governing the types of permits required and how to obtain these permits. The Agency's proposed changes in Part 603 are not adding new requirements, but instead changing the Board's rules to match the statutory language in the Public Water Supply Operations Act.

The Illinois EPA conducted outreach on these proposed rules before proposing them to the Board. The Agency first circulated the draft rules in the Spring of 2013. The Agency accepted comments and made revisions to the Spring 2013 draft, and then recirculated a second draft in the Fall of 2013. The Agency again accepted comments and made revisions to the proposal based on the comments received. The draft rules were circulated to nongovernmental organizations, community water supplies, other government agencies, and multiple engineering consultants and firms. The nongovernmental organizations include: Illinois Society of Professional Engineers, Illinois Rural Water Association, Illinois Section American Water Works Association, and Illinois Potable Water Supply Operators Association. Community water supplies include Aqua American, American Water, Otter Lake Water Commission, and Crystal Lake. The Agency also circulated the draft rules to Southern Illinois University Edwardsville, Illinois Department of Public Health, and the United States Environmental Protection Agency, Region 5. The Agency selected approximately a dozen engineers or engineering firms to share these draft rules with because many of these individuals and firms prepare construction applications on behalf of community water supplies.

Illinois EPA personnel also presented the proposed changes at the fall 2013 Illinois Rural Water Association Northern Conference, the 2013 Spring Water Conference, the Spring 2014 Rural Water Conference, and the 2014 Illinois Potable Water supply Operators Association Conference. Illinois EPA also shared these regulations with the water supply operator Advisory Board in the Fall of 2014.

VI. SYNOPSIS OF TESTIMONY

The Illinois EPA anticipates two witnesses will prefile testimony before the Board's hearings on this proposal, and four witnesses will be present at the Board's hearing to answer

any questions that the Board or the public may have. The witnesses are Agency employees within the Division of Public Water Supplies (DPWS). They are (1) David McMillan, Division Manager, (2) Rick Cobb, Deputy Division Manager; and (3) David Cook, Acting Manager Permit Section; and (4) Steve Johnson, Regional Manager for the Champaign DPWS office.

David McMillan has a Bachelor of Science Degree in Geological Sciences from Bradley University, and is an Illinois licensed professional geologist. He has worked in the Division of Public Water Supplies at Illinois EPA for 29 years, and has been the manager of the Division since December of 2010. In 1985, Mr. McMillan began his career in the Peoria Regional office as a member of the Groundwater Section. He advance into a Unit Manager position in 1992 and moved to the Central Office in Springfield. In 2004, he became the interim Manager of the Field Operations Section, a position that later became permanent. In Mr. McMillan's current position, he leads a collaborative program of four sections staffed by environmental engineers, geologists and specialists. The Permit, Compliance Assurance, Groundwater and Field Operations Sections ensure the safety of the Illinois' drinking water supplies. Together the staff of the Division of Public Water Supplies oversees allocation of resources to conduct inspections, evaluates source water protection programs, issues permits and ensures the safety and compliance of community water systems. The Illinois EPA anticipates that Mr. McMillan will testify regarding policy considerations underlying the proposed rules.

Rick Cobb has a Bachelor of Science in Geology from Illinois State University, and is an Illinois licensed professional geologist. He has worked in the Division of Public Water Supplies at Illinois EPA for 29 years, has been the manager of the Groundwater Section since 1991, and has been the Deputy Division Manager since 2002. During this time he has worked

on the development, implementation and enforcement of groundwater laws and regulations in Illinois. Illinois EPA anticipates that Mr. Cobb will testify regarding policy considerations underlying the proposed rules. Mr. Cobb will not prefile testimony, but will be made available during the hearings to respond to questions from the Board or public.

David Cook has a Bachelor of Science in Mechanical Engineering from the University of Illinois, and is an Illinois licensed professional engineer. He has worked in the Division of Public Water Supplies at Illinois EPA for 25 years, has been the manager of the Springfield Regional Office since 2002, and has been the acting manager of the Permit Section since 2012. During this time he has worked on the development, implementation and enforcement of drinking water regulations in Illinois. Illinois EPA anticipates that Mr. Cook will provide testimony on the Agency's proposed changes to Part 602.

Steve Johnson has a Bachelor of Science Degree in Civil Engineering from the University of Missouri-Rolla, and is an Illinois licensed professional engineer. He has worked in the Champaign Regional Office of the Division of Public Water Supplies at Illinois EPA since January of 1980, and has been the manager of the Champaign Regional Office since May of 2012. Mr. Johnson will not prefile testimony, but will be made available during the hearings to respond to questions from the Board or public.

VII. SUPPORTING DOCUMENTS

A. Documents Relied Upon

The Illinois Administrative Procedure Act provides that all proposed rulemakings must include:

a descriptive title or other description of any published study or research report used in developing the rule, the identity of the person who performed such study, and a description of where the public may obtain a copy of any such study or research report. If the study was performed

by an agency or by a person or entity that contracted with the agency for the performance of the study, the agency shall also make copies of the underlying data available to members of the public upon request if the data are not protected from disclosure under the Freedom of Information Act.

5 ILCS 100/5-40(b)(3.5). The Board's procedural rules require the same information to be included with any rulemaking proposal filed with the Board in 35 Ill. Adm. Code 102.202(e). The Agency did not consult with a published study or research report when developing this proposal. The Agency did not perform any new studies, nor did the Agency contract with any outside entities to perform any studies for the development of this rulemaking proposal. Because no studies were conducted, there is no underlying data meeting the requirements of 5 ILCS 100/5-40(b)(3.5).

B. Incorporations by Reference and Attachments

This section of the Statement of Reasons provides a list of documents the Agency proposes to incorporate by reference. Section 102.202(d) requires the Agency to submit "[a]ny material to be incorporated by reference within the proposed rule pursuant to section 5-75 of the IAPA [5 ILCS 100/5-75]." The Agency proposes incorporating the following documents by reference:

Documents Incorporated By Reference
ASTM. American Society for Testing and Materials, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959, (610) 832-9500.
ASTM D 2241-09, Standard Specification for Poly(Vinyl Chloride) (PVC) Pressure-Rated Pipe (SDR Series), approved December 1, 2009
AWWA. American Water Works Association et al., 6666 West Quincy Ave., Denver, CO 80235 (303-794-7711)
ANSI/AWWA A100-06, Water Wells, approved February 2, 2006, effective August 1, 2006.
ANSI/AWWA B100-09, Granular Filter Material, approved January 25, 2009, effective March 1, 2010.
ANSI/AWWA C151/A21.51-09, Ductile-Iron Pipe, Centrifugally Cast, approved January 25, 2009, effective September 1, 2009.
ANSI/AWWA C200-12, Steel Water Pipe, 6 In. (150mm) and Larger, approved June

10, 2012, effective September 1, 2012.
ANSI/AWWA C301-07, Prestressed Concrete Pressure Pipe, Steel-Cylinder Type, approved January 21, 2007, effective June 1, 2007.
ANSI/AWWA C651-05, Disinfecting Water Mains, approved January 16, 2005, effective June 1, 2005.
ANSI/AWWA C652-11, Disinfection of Water Storage Facilities, approved June 12, 2011, effective October 1, 2011.
ANSI/AWWA C653-03, Disinfection of Water Treatment Plants, approved January 19, 2003, effective June 1, 2003.
ANSI/AWWA C654-03, Disinfection of Wells, approved January 19, 2003, effective November 1, 2003.
AWWA C900-07 Polyvinyl Chloride (PVC) Pressure Pipe and Fabricated Fittings, 4 In. Through 12 In. (100 mm Through 300 mm), for Water Transmission and Distribution, 2007
ANSI/AWWA C905-10, Polyvinyl Chloride (PVC) Pressure Pipe and Fabricated Fittings, 14 In. Through 48 In. (350 mm Through 1,200 mm), approved January 17, 2010, effective April 1, 2010.
AWWA C906-07 Polyethylene (PE) Pressure Pipe and Fittings 4 In. (100 mm) Through 63 In. (1,600 mm) for Water Distribution and Transmission, 2007
ANSI/AWWA D100-11, Welded Carbon Steel Tanks for Storage, approved January 23, 2011, effective July 1, 2011.
ANSI/AWWA D103-09, Factory Coated Bolted Carbon Steel Tanks for Water Storage, approved January 25, 2009, effective November 1, 2009.
ANSI/AWWA D107-10, Composite Elevated Tanks for Water Storage, approved January 17, 2010, effective December 1, 2010.
“The Water Dictionary” 2nd Edition, 2010.
NSF. National Sanitation Foundation International, 3475 Plymouth Road, PO Box 130140, Ann Arbor, Michigan 48113-0140 (734-769-8010).
NFS/ANSI 60-2013 Drinking Water Treatment Chemicals-Health Effects, April, 2014
NSF/ANSI 61- 2013, Drinking Water System Components-- Health Effects, March, 2014.
“Recommended Standards for Water Works—Policies for the Review and Approval of Plans and Specifications for Public Water Supplies,” 2012 Edition, Great Lakes--Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, Health Research Inc., Health Education Services Division, P.O. Box 7126, Albany, NY 12224, (518) 439-7286.

Under the Board's newly adopted procedural rules, the Agency must file three paper originals of any document to be incorporated by reference that is protected by copyright law. 35 Ill. Adm. Code 101.302(h)(4). These rules, however, allow the Agency to substitute two copies for two originals provided that the rulemaking proposal includes the copyright owner's written authorization for the rulemaking proponent to create the paper copy. The Agency

submits three originals or one original and two copies of the above documents in paper form directly with the Illinois Pollution Control Board and files the remainder of this rulemaking proposal electronically. In instances where the Agency is not providing three originals, the Agency also includes a letter from the copyright owner granting the Illinois EPA permission to make the included copies.

VIII. CONCLUSION

WHEREFORE, the Illinois EPA asks the Board to accept this Statement of Reasons and proceed to hearings on the above-captioned rulemaking proposal.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
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THIS FILING IS SUBMITTED ON RECYCLED PAPER

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	R15-
PUBLIC WATER SUPPLIES:)	
PROPOSED AMENDMENTS.)	(Rulemaking- Water)
TO 35 ILL. ADM CODE PARTS 601,)	
602, AND 603)	

CERTIFICATION OF ORIGINATION

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), by one of its attorneys, and pursuant to 35 Ill. Adm. Code 102.202(i), the Illinois EPA certifies that the regulatory proposal in the above captioned matter amends the most recent version of Parts 601, 602 and 603 of the Illinois Pollution Control Board's regulations, as published on the Board's website.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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IN THE MATTER OF:)	
)	R15-
PUBLIC WATER SUPPLIES:)	
PROPOSED AMENDMENTS.)	(Rulemaking- Water)
TO 35 ILL. ADM CODE PARTS 601,)	
602, AND 603)	

MOTION FOR ACCEPTANCE

NOW COMES the Illinois Environmental Protection Agency ("Illinois EPA"), by and through its attorneys, and pursuant to 35 Ill. Adm. Code 102.106, 102.200, and 102.202, moves that the Illinois Pollution Control Board accept for hearing the Illinois EPA's proposal for amendment of 35 Ill. Adm. Code Parts 601, 602, and 603. This regulatory proposal includes (1) Notice of Filing; (2) Appearance; (3) Statement of Reasons; (4) Certification of Origination; and (5) Proposed Regulations.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/Joanne M. Olson
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THIS FILING IS SUBMITTED ON RECYCLED PAPER

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; APPEARANCE; STATEMENT OF REASONS; CERTIFICATE OF ORIGINATION; MOTION FOR ACCEPTANCE; and PROPOSED AMENDMENTS TO 35 ILL. ADM. CODE PARTS 601, 602 AND 603 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 May 8, 2015.

/s/Joanne M. Olson

Joanne M. Olson

SERVICE LIST

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