



ILLINOIS
AMERICAN WATER

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JUN 18 2015

Randolph Pankiewicz
Manager Water Quality &
Environmental Management
Illinois American Water
100 N. Water Works Dr.
Belleville, IL 62223

June 18, 2015

STATE OF ILLINOIS
Pollution Control Board

PC#4

Illinois Pollution Control Board
100 W. Randolph Street
Suite 11-500
Chicago, IL 60601
Attn: John Therriault, Clerk of the Board

Re: PCB-R15-23 - Amendments to Primary Drinking Water Standards, 35 IAC 611

Mr. Therriault,

Illinois American Water Company (ILAWC) is providing the comments, herewith, regarding the Illinois Environmental Protection Agency's request for an emergency rulemaking to amend the fluoridation requirement by public water supplies.

ILAWC is a water utility regulated by the Illinois Commerce Commission providing service to approximately 280,000 water customers throughout the state.

The HHS has adopted the recommendation to lower the fluoridation ion concentration to 0.7 mg/l. The level is substantiated by the scientific research done by the HHS and CDC. Many states have been at this new level for over a year. In the interest of our customers, the public we serve, we respectfully request that this recommended level become effective as soon as possible through the emergency rule making process.

The scientific research is based on many factors including that there are now many additional sources of fluoride provided in toothpastes, oral rinses, topical application, and vitamins.

Even though the current level of fluoridation does not pose a threat to public welfare, the lower level is considered to be the optimum level to provide the benefits of fluoridation. As such we strive to provide that optimum standard of quality.

The cost reduction associated with the change in concentration is based on the difference in source water level (typically 0.2 – 0.5 mg/l) and the fluoride dosage needed to raise the level to 0.7 mg/l versus 0.9-1.2 mg/l. The cost of the fluoride varies dependent upon the type used and the volume of water treated. ILAWC will realize a savings of approximately \$150,000 per year.

The cost savings realized by a public water utility could be used to address other needs of that utility, including plant and infrastructure improvements that would have a positive impact on the quality and reliability of service to its customers.

Please contact me if you have any questions about this response. I can be reached by telephone at 618-239-3249 or by email shown below.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Pankiewicz", written in a cursive style.

Randolph Pankiewicz
Manager Water Quality and Environmental Compliance

CC: Kenneth Jones
Barry Suits
Rex L. Gradeless, IEPA