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STATE OF ILLINOIS
Pollution Control Board

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Illinois Pollution Control Board
100 West Randolph
Suite 11-500
Chicago, IL 60601

Docket: R18-17: Rulemaking – Public Water Supplies: Proposed New 35 Ill. Adm. Code 604 and Amendments to 35 Ill. Adm. Code Parts 601, 602, 607, and 611

August 31, 2018

To Whom It May Concern,

IDEXX commends the Illinois Pollution Control Board (Board) on developing the proposed amendments to 35 Illinois Administrative Code Parts 602, specifically for the Board's consideration to eliminate the analytical testing requirements for water main construction projects, listed within lines 863-893 within section 602.310. At this time, IDEXX would like to request the Board consider the following comments:

1. Supports the consideration to eliminate the analytical testing requirements of either membrane filter technique or the fermentation tube method, for water main construction projects, eliminating lines 863-893 within Section 602.310.

Rational: Removing specific analytical testing requirements allows certified laboratories to streamline testing, using one method for multiple water matrixes.

2. Recommend adding *Legionella pneumophila* to bacteria testing requirements, the primary *Legionella* species associated with Legionnaires' disease.

Rational: *Legionella* bacteria live within potable and non-potable water systems. People become ill when the *Legionella* species *Legionella pneumophila*, the primary species linked to Legionnaires' disease, is aerosolized from the water and in-hailed or aspirated from areas such as: shower heads, ventilators, toilets, hot tubs, air-conditioning units. The bacteria can then infect the macrophages within a person's lungs, producing a severe pneumonia. Legionnaires' disease is the most common waterborne disease within the US, those who are at high risk for contracting Legionnaire' disease are over 50 years of age, with chronic lung disease and/or those with compromised immune systems. More than 6,000 cases of Legionnaires' disease are reported each year, with 9 out of 10 cases being preventable, according to the CDC (<https://www.cdc.gov/legionella/fastfacts.html>) [1,2,3,4, 5,6]. Legionnaires' disease is increasing danger in Illinois as well. Per the CDC National Notifiable Disease Surveillance System, reported cases of Legionellosis in Illinois have increased more than 450% between 2005 and 2015, from .53 to 2.45 cases per 100,000 population.

Listed within R18-17 docket, Case Activity Opinion and Order dated 07/26/2018, there is a *Legionella* discussion starting on page 20 under the *Public Health and Distinction Between Distribution and Plumbing* sections. As discussed, "...Legionella outbreaks typically develop within building's on-premise water systems outside the control of the water utility." However, this statement maybe false. The Water Research Foundation has two research projects, aimed to gain a better understanding of *Legionella* in a distribution water system (Project numbers: RFP# 4911 & RFP# 4721).



We understand and agree having a water safety management plan for building waters is important and that routine water testing is essential to ensure the plan is working as designed. Similarly, routine monitoring of distribution water systems is valuable confirmation that disinfection processes are managing the risk of Legionnaires' disease.

As pointed out within "*Legionellosis on the Rise: A Review of Guidelines for Prevention in the United States*," currently there are very few guidelines and/or regulations from US States on preventing Legionnaires' disease. IDEXX encourages the Board to consider the recommended addition of *Legionella pneumophila* testing as an additional way to strengthen the Public Water Supply regulation and to better protect human health.

We appreciate the opportunity to provide these comments and look forward to the next steps of the rulemaking process.

Respectfully submitted,

A handwritten signature in blue ink, which appears to read "Jody Frymire".

Jody Frymire
Regulatory Affairs Associate, Water
One IDEXX Drive | Westbrook, Maine 04092 USA | idexx.com/water
jody-frymire@idexx.com | Tel: +1 207 556 4840

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