

JUN 17 2015

Central Lake County Joint Action Water Agency



6/16/2015

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

Re: Drinking Water Fluoride Standard

*R 15-23, PC# 3*

Dear Pollution Control Board:

The Central Lake County Water Agency (CLCJAWA) serves Lake Michigan water to 210,000 people in Lake County through member communities that include Lake Bluff, Libertyville, Mundelein, Knollwood, Round Lake, Round Lake Park, Round Lake Beach, Round Lake Heights, Gurnee, Grayslake, Wildwood and Vernon Hills.

I am writing in support of the Illinois EPA emergency rulemaking request to reduce the recommended fluoride concentration to 0.7 mg/L. As guardians of the public water supply we vow to take every reasonable effort to assure efficient production of high quality drinking water for those we serve. After years of research and studies, the science that originally justified fluoridation continues to be strong but suggests the same positive public health outcome may be obtained at a lower fluoride dose. This is well vetted and peer reviewed science that needs to be acted upon now. This letter responds, in part, to the five questions posed by the Board to the IEPA in their June 4, 2014 Order.

**Provide the number of households or individuals served by the community water suppliers that add fluoride:**

*According to an on-line CDC publication titled "2012 Water Fluoridation Statistics" retrieved 6/17/15 from <http://www.cdc.gov/fluoridation/statistics/2012stats.htm>, 98.5% of people receiving water from Illinois community water supplies or 12,682,543 people, receive fluoridated water. CLCJAWA fluoridates its water as is typical of public water supplies throughout our state. We serve more than 210,000 people.*

**Provide the basis upon which the calculations of savings were made:**

*Fluorosilicic Acid (FSA) is the primary source of fluoride ion used by public water supplies. At CLCJAWA, the current low bid price for 23% FSA is \$498 per ton. Over the preceding three years we have purchased an average of 105 tons per year at cost of approximately \$52,000 per year. A reduction from 1 mg/L to 0.7 mg/L will result in a 30% savings or \$15,600 per year at our facility. This money would be better spent reducing water rates or investing in capital improvements. In addition to the reduced chemical cost, there is reduced electrical cost, maintenance cost,*

replacement equipment cost, etc.

Also note that as we debate this, some utilities are replacing fluoride feed equipment. In our case, we recently completed a total upgrade to our fluoride feed facilities for \$382,249. With the inevitable reduction of the fluoride dose on the horizon, we are now left with a bulk tank, day tank, flow meter and fluoride feed pumps that are oversized by 30%. Reducing the required fluoride dose immediately will allow utilities who are in the process of upgrading their systems, to avoid the soon-to-be unnecessary expense of larger pumps and tankage.

**Address whether, and if so, why, the prospect of community water suppliers not realizing the estimated cost savings for a 5 month period reasonably constitutes a threat to the public interest, safety or welfare:**

*This question suggests that there is an unnecessary cost expenditure made by Illinois water supplies that may be in the public interest. At CLCJAWA, the unnecessary expenditure of \$15,600 per year in chemical costs and the resulting suboptimal water quality for our citizens is not in the best interest of those I serve.*

**Provide specific hardships or detrimental effects to community water suppliers that are more likely than not to result if an emergency rule is not granted:**

*Please see #3 above.*

**Indicate what, if any, significant public health impacts would result to the customers of community water systems if the amount of fluoridation were reduced as proposed:**

*Please refer to "U.S. Public Health Service Recommendation for Fluoride Concentration in Drinking Water for the Prevention of Dental Caries." Public Health Reports. July-August 2015. Volume 130. Public Health Reports. Retrieved 6/15/12  
[http://www.publichealthreports.org/documents/PHS\\_2015\\_Fluoride\\_Guidelines.pdf](http://www.publichealthreports.org/documents/PHS_2015_Fluoride_Guidelines.pdf)*

The Illinois EPA is justified in their request for this emergency rulemaking and is acting in the best interest of our citizens. If you have any further specific questions, please contact me.

Sincerely,



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cc: Executive Director