From:	McGill, Richard
To:	Brown, Don
Cc:	Pauley, Daniel
Subject:	FW: 35 IAC 611 (R21-10)
Date:	Monday, July 31, 2023 2:48:23 PM
Attachments:	image001.png

Good afternoon, Mr. Clerk:

Please docket this email exchange with JCAR staff as a public comment in R21-10.

Thank you.

Richard R. McGill, Jr.
Senior Attorney for Research & Writing
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
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richard.mcgill@illinois.gov (312) 814-6983

From: Eastvold, Jonathan C. <JonathanE@ilga.gov>
Sent: Monday, July 31, 2023 9:38 AM
To: McGill, Richard <Richard.McGill@illinois.gov>
Subject: [External] RE: 35 IAC 611 (R21-10)

The working document is in Word, so it looks like some of the comment bubbles will be cut off.

Here's the list in usual format:

1.   In line 441, change "21-9" to "21-10".

2.   In line 453, strike "USC" and add "U.S.C.".

3.   In line 489, change the semicolons to commas.

4.   In line 516, strike "USC" and add "U.S.C.".

5.   In line 574, strike "USC" and add "U.S.C.".

6.   In line 677, strike "ℓ" and add "L".

7.   In line 827, strike "ℓ" and add "L" twice.

8.   In line 866, strike "ℓ" and add "L".

9.   In line 923, strike "ℓ" and add "<u>L</u>".

10.   In line 1038, strike "ℓ" and add "<u>L</u>".

11.   In line 1040, change "<u>ℓ</u>" to "<u>L</u>".

12.   In line 1209, strike "ℓ" and add "<u>L</u>".

13.   In line 1215, strike "USC" and add "<u>U.S.C.</u>".

14.   In line 1264, strike "USC" and add "<u>U.S.C.</u>".

15.   In line 1326, strike "USC" and add "<u>U.S.C.</u>".

16.   In lines 1376 and 1377, change the semicolons to commas.

17.   In line 1387, strike "ℓ" and add "<u>L</u>".

18.   In line 1408, strike "ℓ" and add "<u>L</u>".

19.   In line 1414, strike "ℓ" and add "<u>L</u>".

20.   In line 1424, strike "USC" and add "<u>U.S.C.</u>".

21.   In line 1504, strike "USC" and add "<u>U.S.C.</u>".

22.   In line 1536, strike the URL and add "<u>https://www.astm.org/products-services/standards-and-publications.html</u>".

In line 2102, the URL goes to the main HSDL page, not a specific document.

23.   In line 2139, strike "on-line" and add "<u>online</u>".

In line 2140, I can't find the download at that location.

24.   In lines 2345-2348, strike "from International Atomic Energy Agency (IAEA), Vienna International Centre, PO Box 100, 1400 Vienna, Austria, ((+43-1) 2600-0; <u>www.iaea.org</u>////<u>Public/</u> /048/37048205.pdf) or".

25.   In line 2349, strike "MC100-44, PO Box 117, Oak Ridge, TN 37831-0117" and add "<u>100 ORAU Way, Oak Ridge, TN 37830</u>". After "3146" add "<u>; https://www.orau.org/health-physics-museum/files/library/nbs/nbs-69.pdf</u>".

In line 2380, the link to oico.com forwards to <u>https://www.ysi.com/oi-analytical</u>.

In line 2460, the link to <u>https://awwa.org/store</u> goes to <u>https://engage.awwa.org/PersonifyEbusiness/</u>.

Lines 3815-3817: This information probably needs to be updated.

Line 4817: The link to ntrl.ntis.gov forwards to https://ntrl.ntis.gov/NTRL/.

26.   In line 4872, strike the URL and add
        "https://www.nemi.gov/methods/method_summary/8907/".

27.   In lines 4914-4915, 4932-4933, and 4968-4969, delete the space in the URL.

28.   In line 5441, strike "USC" and add "U.S.C.".

29.   In line 5515, strike "USC" and add "U.S.C.".

30.   In lines 5551 and 5554, strike "USC" and add "U.S.C.".

31.   In line 5584, strike "USC" and add "U.S.C.".

32.   In line 5612, strike "USC" and add "U.S.C.".

33.   In line 5665, strike "ℓ" and add "L".

34.   In line 5701, change "like" to "such as".

35.   In line 5710, change "having" to "that".

36.   In line 5733, delete the comma.

37.   In line 5734, change ", actively cooling" to "that actively cools".

38.   In lines 5739-5740, change ", including" to "include".

39.   In line 5757, after "as" add "defined in".

40.   In line 5758, delete "defines".

41.   In line 5764, change "meeting" to ", that meets".

42.   In line 5770, change "having" to "has".

43.   In line 5785, change the semicolon to a comma.

44.   In line 5800, after "as" add "defined in".

45.   In line 5801, delete "defines.

46.   In line 5809, after the closing quotation mark add "or "PWS"". Change "as" to "defined in".
        Delete "defines".

47.   In line 5827, after the closing quotation mark add a comma. After "Section" add a comma.

48.   In lines 5827-5828, delete "an article meeting two conditions".

49.   In lines 5830 and 5832, change "if" to ", for".

50.   In line 5854, delete "the manufacturer applies" and after "coating" add "is applied".

51.   In lines 5862-5863, delete ", etc.".

52.   In line 5880, after "pipe" change the comma to "or any".

53.   In lines 5880-5881, delete ", solder, or flux". [Not in corresponding federal wording]

54.   In line 5894, change "USC" to "U.S.C.".

55.   In line 5918, change ", like" to "such as".

56.   In line 5920, change "anyone" to "that someone".

57.   In line 5933, delete "for" twice. Change "(these" to ". These".

58.   In line 5935, change "gasses" to "gases". Delete the closing parenthesis.

59.   In lines 5943-5944, change "steam capable" to "steam-capable".

60.   In line 5954, change "using" to "it is illegal to use".

61.   In line 5955, delete "is illegal".

62.   In line 5966, change "introducing" to "the introduction of".

63.   In line 5967, change "documents" to "documentation".

64.   Change line 5971 to "The".

65.   In line 5972, after "fixtures" add "do not need to be certified".

66.   Change line 5975 to "Direct".

67.   In line 5977, after "products" add "do not need to be certified".

68.   Change line 5981 to "Dishwashers do not need to be certified.".

69.   In line 5984, change "third party" to "third-party". After "as" add "provided in".

70.   In line 5985, delete "provides otherwise".

71.   In line 5989, after "as" add "required by".

72.   In line 5990, delete "requires".

73.   In lines 5992-5993, delete "may be self-certified by manufacturers or importers".

74. In line 6003, delete "manufacturer must calculate its".

75. In line 6004, after "employees" add "must be calculated". Change "it" to "the manufacturer".

76. In line 6005, change "fulltime" to "full-time".

77. In line 6012, change "of" to "after".

78. In line 6021, after "that" add "its".

79. In line 6023, change "fulfill certain conditions" to "be".

80. In line 6025, change "A" to "Signed by a".

81. In line 6027, delete "must sign the certificate".

82. In line 6029, change "The manufacturer or importer must post the certificate" to "Posted".

83. In line 6031, delete "distributing". After "certificate" add "is being distributed".

84. In lines 6035-6036, delete "specific information".

85. In lines 6048-6049, delete "the certificate must also include".

86. In line 6051, change "any applicable" to ", when applicable,".

87. In lines 6056 and 6062, change "USC" to "U.S.C.".

88. In lines 6071 and 6072, change "documents" to "documentation".

89. In line 6075, change "documents giving" to "documentation of".

90. In line 6076, change "documents" to "documentation".

91. In line 6078, change "these documents" to "documentation".

92. In line 6080, delete "provides". Change "documents" to "documentation".

93. In line 6090, after "with the" add "federal Safe Drinking Water".

Line 6091: An enforcement action by whom? State and/or federal?

94. In line 6096, change "like" to "such as".

95. In line 6098, change "USC" to "U.S.C.".

96. In line 6446, strike "USC" and add "U.S.C.".

97. In line 6479, strike "USC" and add "U.S.C.".

98.   In line 6488, after "nepis.epa.gov" add a semicolon.

99.   In line 6527, strike "USC" and add "U.S.C.".

100.   In line 6608, change "USC" to "U.S.C.".

101.   In line 6630, change "other" to "alternative".

102.   In line 6691, strike "USC" and add "U.S.C.".

103.   In lines 6736 and 6740, strike "followup" and add "follow-up".

104.   In line 7382, strike "ℓ" and add "L".

105.   In lines 7565, 7569, and 7572, strike "ℓ" and add "L".

106.   In lines 7667 and 7672, strike "ℓ" and add "L".

107.   In lines 7705 and 7709, strike "ℓ" and add "L".

108.   In lines 7762 and 7767, strike "ℓ" and add "L".

109.   In the table after line 7967 and in line 7978, strike "ℓ" and add "L".

110.   In lines 7985 and 7990, strike "ℓ" and add "L".

111.   Throughout the table after line 8025, strike "ℓ" and add "L".

112.   In the table after line 8038, in the entries for mercury, , strike "ℓ" and add "L" three times.

113.   In the table after line 8045, change "to" to "through" 10 times.

114.   In line 8047, strike "USC" and add "U.S.C.".

115.   In the table after line 8079, strike "ℓ" and add "L".

116.   In the table after line 8100, strike "ℓ" and add "L".

117.   In the table after line 8110, strike "ℓ" and add "L".

118.   In the table after line 8116, strike "ℓ" and add "L".

119.   In line 8139, strike "USC" and add "U.S.C.".

120.   In the table after line 8150, strike "ℓ" and add "L".

121.   In the table after line 8170, strike "ℓ" and add "L".

122.   In the table after line 8194, strike "ℓ" and add "L".

123.   In lines 8304 and 8311, strike "ℓ" and add "L".

124.   In line 8338, strike "ℓ" and add "L".

125.   In line 8429, change "Complying" to "Compliance".

126.   In line 8432, restore "community water".

127.   In lines 8433-8434, restore the stricken text.

128.   In lines 8436-8437, change "beginning no later than" to "by".

129.   In lines 8440 and 8441, delete the comma.

130.   In line 8454, change "needs no longer" to "no longer needs to".

131.   In lines 8463-8464, change the semicolons to commas.

132.   In line 8491, strike "ℓ" and add "L" twice.

133.   In line 8510, after the second "school" add "classified by". Delete "classifies".

134.   In line 8511, change "to" to "through".

135.   In line 8525, change "ℓ" to "L".

136.   In line 8542, change "out-of-service" to "out of service".

137.   Change line 8564 to "A lead service line may be owned by the water system, the property owner, or both. A".

138.   In line 8565, after "if" add "it was".

139.   In line 8567, change "that" to ", and it".

140.   In line 8568, after "that is" add "considered".

141.   In line 8570, after "not" add "considered".

142.   In line 8572, change "not" to "has not been".

143.   In line 8574, after "composition" add "of a service line (e.g., copper or plastic)".

144.   In lines 8574-8575, delete "(for example, copper or plastic) of a service line".

145.   In line 8575, change "records demonstrating" to "if records demonstrate that".

146.   In line 8576, change "Federal" to lower case.

147.   In line 8582, change "ℓ" to "L".

148.   In line 8639, change "requiring replacement service line" to "service line requiring replacement,". After "leaving" add "in service".

149.   In line 8640, delete "requiring replacement".

150.   In line 8647, change "gravity fed" to "gravity-fed".

151.   In line 8648, after "or" add "an".

152.   In line 8649, after "with" add "the version of". Delete "as".

153.   In line 8673, change "primarily educating" to "that primarily provides teaching and learning for".

154.   In line 8721, change "term when" to "period of time during which".

155.   In line 8723, change "determines" to "determine".

156.   In line 8769, after "concentration" add "determined in". Delete "determines". Change "ℓ" to "L".

Line 8772: Why not give this value in µg/L too for consistency's sake?

157.   In lines 8772 and 8775, strike "ℓ" and add "L".

158.   In line 9012, strike the period.

159.   In line 9023, change "limit" to "level". Change "ℓ" to "L".

160.   In line 9030, change "limit" to "level".

161.   In line 9034, delete the period.

162.   In line 9057, delete the comma.

163.   In line 9097, change "Not exceeding" to "A small or mid-sized supplier not applying corrosion control treatment is deemed to have OCCT if it does not exceed".

164.   In line 9098, change "remaining" to "remains".

165.   In lines 9100-9101, delete "deems a small or mid-sized supplier not applying corrosion control treatment to have OCCT".

166.   In line 9109, change "Not exceeding" to "A small or mid-sized supplier applying corrosion control treatment is deemed to have OCCT if it does not exceed".

167.   In line 9111, change "remaining" to "remains".

168.   In lines 9112-9114, delete "deems a small or mid-sized supplier applying corrosion control

treatment to have OCCT".

169.   In line 9114, change "Complying with this Section deems" to "If".

170.   In line 9115, change "exceeding" to "exceeds".

171.   In line 9116, change "not exceeding" to "does not exceed".

172.   In line 9117, change "remaining" to "remains".

173.   In line 9119, after "611.356" add ", that supplier is deemed".

174.   In line 9163, change "ℓ" to "L".

175.   In line 9223, after "applicable" add "option".

176.   In line 9296, delete the comma.

177.   In line 9309, after "timeframes" add "in".

178.   In line 9310, delete "specify".

179.   In line 9382, restore "described in".

180.   In line 9383, delete "the steps describe".

181.   In line 9414, after "Step 2" add a period.

182.   In line 9421, after "within the" add "applicable timeframe in". Strike "appropriate of the" and "timeframes".

183.   In line 9422, delete "establish".

184.   In line 9449, delete "of this section".

185.   In line 9552, after "recommend" add "that".

186.   In line 9561, change "needs not" to "does not need to".

187.   In line 9562, delete the comma.

188.   In line 9581, change "ℓ" to "L".

189.   In lines 9629 and 9634, change "ℓ" to "L".

190.   In lines 9729 and 9735, change "ℓ" to "L".

191.   In lines 9884 and 9885, change "ℓ" to "L".

192.   In line 11329, strike "ℓ" and add "L".

193.   In line 11332, change "ℓ" to "L".

194.   In lines 11348 and 11359, change "ℓ" to "L".

195.   In line 11449, change "ℓ" to "L".

196.   In line 11473, change "ℓ" to "L".

197.   In lines 11514 and 11529, change "ℓ" to "L".

198.   In lines 12445 and 12447, strike "ℓ" and add "L".

199.   In line 12665, strike "USC" and add "U.S.C.".

200.   In lines 12690 and 12694, strike "ℓ" and add "L".

201.   In line 12764, strike "ℓ" and add "L".

202.   In line 12769, strike "ℓ" and add "L".

203.   In line 13195, change "ℓ" to "L".

204.   In line 13200, strike "ℓ" and add "L".

205.   In lines 13297 and 13298, strike "ℓ" and add "L".

206.   In lines 13507 (twice), 13511 (twice), and 13514, strike "ℓ" and add "L".

207.   In lines 13540 (twice), 13544, 13545, 13546, and 13547, strike "ℓ" and add "L".

208.   In line 14367, change "USC" to "U.S.C.".

209.   In lines 14807, 14809, 14811, 14813, 14815, 14817, 14819, 14821, 14823, 14825, and 14828, strike "ℓ" and add "L".

210.   In line 15010, strike "ℓ" and add "L".

211.   In line 15036, strike "ℓ" and add "L".

212.   In lines 15506 and 15508, strike "ℓ" and add "L".

213.   In lines 15571 and 15574, strike "ℓ" and add "L".

214.   In the first row of the table after line 15706, strike "ℓ" and add "L" twice.

215.   In the third-to-last and second-to-last rows of the table after line 15706, strike "ℓ" and add "L".

216.   In line 15778, strike "ℓ" and add "L".

217.   In line 16395, 16397, 16401, 16403, 16405, 16407, 16409, 16411, and 16413, strike "ℓ" and add "L".

218.   In lines 16415, 16417, 16419, 16421, and 16423, strike "ℓ" and add "L".

219.   In line 17279, strike "ℓ" and add "L" (twice).

220.   In the first line of the table after line 17567, strike "ℓ" and add "L".

221.   In the first line of the table after line 17570, strike "ℓ" and add "L".

222.   In the last four rows of the table after line 17755, strike "ℓ" and add "L".

223.   In the 2nd through 7th rows of the table after line 17763, strike "ℓ" and add "L".

224.   In lines 17970 and 17973, strike "ℓ" and add "L".

225.   In line 18012, strike "ℓ" and add "L".

226.   In lines 18063 and 18089, strike "ℓ" and add "L".

227.   In line 18094, change "sum" to "add". (?)

228.   In line 18333, strike "ℓ" and add "L" (twice).

229.   In lines 18702 and 18722, strike "mℓ" and add "mL".

230.   In line 18890, change "as" to "when".

231.   In line 18892, change "sooner of specified" to "earlier of the" and restore "following". Strike "times" and add "intervals".

232.   In lines 18895 and 18898, delete "Within" and restore "The"

233.   In line 18911, after "Agency" add "that it is". After "with" add "the".

234.   In line 18912, after "notification" add "requirements of".

235.   In line 18923, after "practicable" add a comma.

236.   In line 19256, delete "clearly" and restore "include a clear". Delete "understandably".

237.   In line 19257, delete "explain" and restore "understandable explanation of".

238.   In line 19260, delete "Failure in monitoring or" and restore "Monitoring and".

239.   In lines 19562 and 19563, strike "ℓ" and add "L".

240.   In line 19626, strike "ℓ" and add "L".

241.	In line 19688, strike "ℓ" and add "L".

242.	In line 19845, strike "ℓ" and add "L" twice.

243.	In line 19865, strike "ℓ" and add "L" twice.

244.	In line 19900, delete "deciding" and restore "it decides".

245.	In lines 19998 and 20001, strike "mℓ" and add "mL".

246.	In line 20099, strike "ℓ" and add "L".

247.	In line 20188, after the semicolon add "or".

248.	In lines 20188-20189, strike "epacdx@csc.com ("Technical Support" in the subject line); or fax 301-429-3905" and add "helpdesk@epacdx.net".

249.	In lines 20263-20264, strike "epacdx@csc.com ("Technical Support" in the subject line); or fax 301-429-3905" and add "helpdesk@epacdx.net".

250.	In line 20287, strike "ℓ" and add "L".

251.	In line 20306, strike "ℓ" and add "L" (twice).

252.	In line 20332, strike "mℓ" and add "mL".

253.	In line 20520, strike "mℓ" and add "mL".

254.	In line 20524, restore "density".

255.	In line 20850, change "ℓ" to "L".

256.	In lines 20913, 20914, 20936, and 20939, change "ℓ" to "L".

257.	In line 21694, change "ℓ" to "L".

258.	In lines 22679 and 22681, change "ℓ" to "L".

259.	In line 22863, change "USC" to "U.S.C.".

260.	In lines 22887 and 22891, change "ℓ" to "L".

261.	In lines 22950 and 22955, change "ℓ" to "L".

262.	In line 23219, change "ℓ" to "L".

263.	In lines 23295 and 23296, change "ℓ" to "L".

264.	In line 23392, change "ℓ" to "L" twice.

265.   In line 23410, change "ℓ" to "L" twice.

266.   In line 23441, change "ℓ" to "L" twice.

267.   In line 23445, change "ℓ" to "L" twice.

268.   In line 23448, change "ℓ" to "L".

269.   In lines 23471, 23475, and 23477, change "ℓ" to "L" twice.

270.   In line 23675, change "ℓ" to "L".

271.   In line 23779, change "G" to "AG".

272.   In line 23801, change "ℓ" to "L" twice.

273.   In the first row of the table after line 23934, strike "ℓ" and add "L" (twice).

274.   In the table after line 23934, in the third column of the rows labeled "77" through "79", ,
        strike "ℓ" and add "L".

275.   In lines 23999 and 24001, strike "ℓ" and add "L".

276.   In line 24015, strike "ℓ" and add "L" twice.

277.   In lines 24091 and 24095, change "ℓ" to "L".

278.   In lines 24290 and 24291, change "ℓ" to "L".

Thanks for your consideration.

Sincerely,

Jonathan

Jonathan C. Eastvold, Ph.D.
Rules Analyst III

Illinois General Assembly
Joint Committee on Administrative Rules
700 Stratton Building
Springfield IL 62706
217-524-9010

From: McGill, Richard <Richard.McGill@illinois.gov>

Sent: Friday, July 28, 2023 13:14
To: Eastvold, Jonathan C. <JonathanE@ilga.gov>
Subject: RE: 35 IAC 611 (R21-10)

Good afternoon, Jonathan:

I'm not sure whether your working document is Word or PDF, but as I would be having it docketed as a public comment in COOL, it would be a PDF in COOL. Would its comment bubbles still function there? If so, that format is fine with me. Otherwise, I'd need the usual Exhibit K-style list.

I'm happy to give the r01 with comment bubbles a try.

Thanks

Richard R. McGill, Jr.
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From: Eastvold, Jonathan C. <JonathanE@ilga.gov>
Sent: Friday, July 28, 2023 11:16 AM
To: McGill, Richard <Richard.McGill@illinois.gov>
Subject: [External] 35 IAC 611 (R21-10)

I went through this rulemaking and noted a number of potential changes. Would it be easier for you if I prepared the usual Exhibit K-style list of requested changes or, given the size, if I just sent you my working document (an r01 version of the rulemaking with my comments in comment bubbles)?

Either will work for me.

Thanks,

Jonathan

Jonathan C. Eastvold, Ph.D.
Rules Analyst III

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