BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
SDWA UPDATE, USEPA AMENDMENTS	)	R2025-001A
(January 1, 2024, through December 31, 2024)	)	(Identical-in-Substance
	)	Rulemaking – Public Water Supply)

NOTICE OF FILING

To:

Don A. Brown, Clerk
Illinois Pollution Control Board
600 E. Van Buren Street, Suite 630
Chicago, Illinois 60605

Joan Beacom, Hearing Officer
Illinois Pollution Control Board
600 E. Van Buren Street, Suite 630
Chicago, Illinois 60605

Persons included on the attached **Service List**.

PLEASE TAKE NOTICE that the United States Environmental Protection Agency Region 5 Office today filed Public Comments in rulemaking, R2025-01(A), which reiterates stringency concerns remaining from the consolidated rulemaking, R2025-01 and R2025-09, as published in the Illinois Register, Vol. 50, Issue 34, p. 12164 (Aug. 21, 2026).

Dated: 10/5/2026

Respectfully submitted,

10/5/2026

X

Stacy Meyers

Signed by: Environmental Protection Agency

Stacy Meyers, State Oversight Specialist
U.S. EPA, Region 5
Ground Water Drinking Water Branch
77 West Jackson Blvd., Ste 1500
Chicago, Illinois 60604
Meyers.stacy@epa.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
SDWA UPDATE, USEPA AMENDMENTS	)	R25-1(A)
(January 1, 2024, through December 31, 2024)	)	(Identical-in-Substance
	)	Rulemaking – Public Water Supply)

CERTIFICATE OF SERVICE

I, Stacy Meyers, hereby certify that I have served public comments by the United States Environmental Protection Agency in the rulemaking, R2025-01(A), upon:

Don A. Brown, Clerk
Illinois Pollution Control Board
600 E. Van Buren Street, Suite 630
Chicago, Illinois 60605

via the Clerk's Office On-Line electronic filing on October 5, 2026: and upon the attached service list by electronic mail on October 5, 2026.

Dated: 10/5/2026

Respectfully submitted,

10/5/2026

X Stacy Meyers

Stacy Meyers

Signed by: Environmental Protection Agency

Stacy Meyers, State Oversight Specialist
U.S. EPA, Region 5
Ground Water Drinking Water Branch
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October 5, 2026

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Illinois Department of Natural Resources* **Interested Party** John Fischer - Acting General Counsel	One Natural Resources Way	Springfield IL 62702-1271	217/782-1809 217/524-9640

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
SDWA UPDATE, USEPA AMENDMENTS	)	R2025-01(A)
(January 1, 2024, through December 31, 2024)	)	(Identical-in-Substance
	)	Rulemaking – Public Water Supply)

FOLLOW-UP TECHNICAL COMMENTS SUBMITTED BY THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 OFFICE

(October 5, 2026)

The U.S. Environmental Protection Agency Region 5 Office (EPA) submits the following technical comments in the form of an abbreviated crosswalk in Subdocket R2025-01(A), which the Illinois Pollution Control Board (Board) opened to further assess technical and historical issues raised by the EPA that were not addressed in its consolidated rulemaking under R2025-01 and R2025-09. In response to the Board Opinion and Order on January 22, 2026, the EPA submits these comments to highlight stringency concerns regarding the finalized Illinois regulations in R2025-01 and R2025-09, which were unresolved in the proposed revisions to state regulations pursuant to the Board Opinion and Order on August 6, 2026.

EPA respectfully requests that the Board fully address the EPA Region 5 Water Division concerns regarding the state provisions listed below that are not identical in substance (I-I-S) to the related National Primary Drinking Water Regulations.

Specifically, the EPA is providing technical comments related to the following National Primary Drinking Water Regulations:

- Lead and Copper Rule Improvements (LCRI) (2024)
- Lead and Copper Rule Revisions (LCRR) (2021)
- Lead and Copper – Short Term Revisions (LCR-STR) (2007)
- Lead and Copper – Minor Revisions (LCR-MR) (2000)
- Control of Per- and Polyfluoroalkyl Substances (PFAS) (2024)
- Consumer Confidence Report Rule Revisions (CCR3) (2024)
- Updated Analytical Methods (2024)
- Revisions to Variances and Exemptions

The EPA reserves the right to further review and comment on any final state rulemaking, and this table is not to be construed as complete or determinative of any existing or future primacy request by the State.

Highlighted in orange below are provisions where EPA previously identified I-I-S stringency issues concerning state regulatory language in relation to corresponding National Primary Drinking Water Regulations. EPA comments regarding ministerial errors are highlighted in yellow in the abbreviated crosswalk, which are also important for clarity. EPA acknowledges and continues to support important revisions proposed by the Board, which are highlighted in green.

EPA's technical review under R2025-01/R2025-09 included outstanding stringency concerns regarding lead and copper provisions that EPA raised in previous Board proceedings. These comments remain relevant to state primacy requests regarding the LCRI, LCRR, LCR-STR, and LCR-MR. It is important to note that the LCRI integrates and builds upon numerous sections under LCRR, LCR-STR, and LCR-MR.

Unresolved stringency issues regarding all four lead and copper rules will be problematic if not addressed prior to Illinois' request for primacy for LCRI in October 2026, which will integrate the state primacy requests for LCRR, LCR-MR, and LCR-STR. EPA is requiring states to combine LCRI and LCRR into one primacy request. If Section AH (LCRR) is now in

effect, and the State has not issued any exemptions for lead and copper rule requirements that were in effect on or before December 15, 2021, it appears that Section AG (LCR-MR and LCR-STR) no longer applies to systems. However, even if state rules under Subpart AG (LCR-MR and LCR-STR) have been phased out and replaced by the current rules in Subpart AH (LCRR), a number of stringency concerns in Subpart AG have been duplicated and perpetuated in Subpart AH (LCRR) and Subpart G (LCRI). Consequently, stringency concerns that were reproduced in Subpart AH will likely delay the State from receiving primacy until at least 2028. Stringency concerns that have carried over from Subpart AG into Subpart G (LCRI) will likely create a permanent barrier to state primacy for all four rules. For these reasons, the EPA requests that the Board remedy the EPA stringency concerns in the related LCRR and LCRI provisions cited to in EPA comments regarding the Section AG rules in this proceeding under R2025-01(A).

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
Lead Rule Content in the EPA LCRI Crosswalk (Illinois Rule Subparts A, G, Q, Appendices) * Note: Consumer Confidence Report sections are listed separately under Subpart O.			
Subpart A—General			
40 CFR 141.28 Certified laboratories.			
For the purpose of determining compliance with § 141.21 through 141.27, 141.40, 141.74, 141.89,141.402, 141.901, and 141.902, samples may be considered only if they have been analyzed by a laboratory certified by EPA or the State except that measurements of alkalinity, disinfectant residual, orthophosphate, pH, silica, temperature, and turbidity may be performed by any person acceptable to the State.	40 CFR § 141.28(a)	35 Ill. Adm. Code 611.490(a) For the purpose of determining compliance with Subparts G, K through O, Q, ~~and~~ S, and AZ samples will be considered only if they have been analyzed by one of the following: 1) A laboratory certified under Section 4(o) of the Act; 2) A laboratory certified by USEPA; 3) When no laboratory has been certified under subsection (a)(1) to analyze a particular contaminant, a laboratory certified, registered, accredited, licensed, or otherwise approved by another state with primary enforcement responsibility, or an agency of the federal government, unless the Agency has, by written notice, informed the supplier that a particular laboratory or laboratories may not be used; or 4) For measurements of alkalinity, ~~calcium, conductivity,~~ disinfectant residual, orthophosphate, silica, turbidity, free chlorine residual, temperature, and pH, a person under the supervision of a certified operator (35 Ill. Adm. Code 603.103).	**Typographical Issue**: Include a comma after "AZ" in the first sentence.
Control of Lead and Copper (Proposed Illinois Subpart G)			
40 CFR 141.81 Applicability of corrosion control treatment steps to small, medium, and large water systems.			
Step 2: State requires CCT study or State designates re-optimized OCCT. Within one year after the end of the tap sampling period in which a medium water system without lead service lines or a small system exceeded the lead action level or copper action level, the State may require the water system to perform corrosion control studies for re-optimization (§ 141.82(c)(2)). If the State does not require the system to perform such studies, the State must specify re-optimized optimal corrosion control treatment (§ 141.82(d)) within the timeframes specified in paragraphs (d)(2)(i) and (ii) of this section. The State must provide its determination to the system in writing:	40 CFR § 141.81(d)(2)	35 Ill. Adm. Code 611.351(d)(2) Step 2: Agency requires CCT study or Agency designates re-optimized OCCT. Within one year after the end of the tap sampling period in which a medium supplier without led service lines or a small supplier exceeded the lead action level or copper action level, the Agency may require the supplier to perform corrosion control studies for re-optimization (Section 611.352 (c)(2)). If the Agency does not require the supplier to perform such studies, the Agency must specify re-optimized optimal corrosion control treatment (Section 611.352(d) within the timeframes in subsections (d)(2)(A) and (d)(2)(B). The Agency must provide its determination to the supplier in writing:	**LCRI** Typographical issue: Revise "led" in second sentence to read "lead". EPA appreciates the Board explanation, but the word "led" was not revised to read "lead" in the proposed rule text provided for public comment.
40 CFR 141.85 Public education and supplemental monitoring and mitigation requirements.			
A water system that exceeds the lead action level based on tap water samples collected in accordance with § 141.86 must distribute the public education materials contained in paragraph (a) of this section in accordance with the delivery requirements in paragraph (b) of this section. Water systems that exceed the lead action level must offer to sample the tap water of any person served by the water system who requests it in accordance with paragraph (c) of this section. Water systems must offer to sample for lead in the tap water of any person served by a lead, galvanized requiring replacement, or lead status unknown service line who requests it in accordance with paragraph (c)	40 CFR § 141.85	35 Ill. Adm. Code 611.355 A supplier that exceeds~~exceeding~~ the lead action level based on tap water samples collected in compliance with~~under~~ Section 611.356 must distribute~~deliver~~ the public education materials contained in subsection (a) in compliance with the delivery requirements in ~~requires under~~ subsection (b). Suppliers~~A supplier~~ that exceed~~exceeding~~ the lead action level must offer to sample the tap water of any person~~customer~~ served by the water system who request ~~requesting~~ it~~sampling~~ in compliance with ~~under~~ subsection (c). Suppliers must offer to sample for lead in the tap water of any person served by a lead, galvanized requiring replacement, or lead status unknown service line who requests it in compliance with subsection (c). All	**LCRI** **Typographical issue:** Revise "request" to read "requests" in the second sentence.

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
of this section. All water systems must deliver a consumer notice of lead tap water monitoring results and copper tap water monitoring results to persons served by the water system at sites that are sampled, as specified in paragraph (d) of this section. A water system with lead, galvanized requiring replacement, or lead status unknown service lines must deliver public education materials to persons with a lead, galvanized requiring replacement, or lead status unknown service line as specified in paragraphs (e) and (f) of this section. All community water systems that do not meet the minimum replacement rate for mandatory service line replacement as required under § 141.84(d) must conduct outreach activities as specified in paragraph (h) of this section. All community water systems must conduct annual outreach to local and State health agencies as outlined in paragraph (i) of this section. Water systems with multiple lead action level exceedances, as specified in paragraph (j)(1) of this section, must conduct public outreach and make filters certified to reduce lead available as specified in paragraphs (j)(2) through (6) of this section. For water systems serving a large proportion of consumers with limited English proficiency, as determined by the State, all public education materials required under this section must comply with the language requirements in paragraph (b)(1) of this section.		suppliers must deliver a consumer notice of lead tap water monitoring results and copper tap water monitoring results to persons served by the supplier at sites that are sampled, as specified in subsection (d). A supplier with lead, galvanized requiring replacement, or lead status unknown service lines must deliver public education materials to persons with a lead, galvanized requiring replacement, or lead status unknown service line as specified in subsections (e) and (f). All CWSs that do not meet the minimum replacement rate for mandatory service line replacement as required under Section 611.354(d) must conduct outreach activities as specified in subsection (h). All CWSs must conduct annual outreach to local and State health agencies as outlined in subsection (i). Suppliers with multiple lead action level exceedances, as specified in subsection (j)(1), must conduct public outreach and make filters certified to reduce lead available as specified in subsection (j)(2) through (j)(6). For suppliers serving a large proportion of consumers with limited English proficiency, as determined by the Agency, all public education materials required under this section must comply with the language requirements in subsection (b)(1). ~~A small CWS or NTNCWS supplier electing to implement POU devices as a small supplier compliance flexibility option under Section 611.363 must provide public education materials as subsection (j) requires to inform users how to properly use POU devices. A supplier must deliver a consumer notice of lead tap water monitoring results to persons the supplier serves at each site that the supplier samples, as subsection (d) specifies. A supplier with lead, galvanized requiring replacement, or lead status unknown service lines, as defined in Section 611.354(a)(4), must deliver public education materials to persons served through these service lines as subsections (e) through (g) specify. A CWS supplier must conduct annual outreach to the Illinois Department of Public Health and local health agencies as subsection (i) provides. A CWS supplier serving more than 10,000 persons failing to meet its annual lead service line replacement goal under Section 611.354(f) must conduct outreach activities as subsection (h) specifies.~~	
40 CFR 141.90 Reporting requirements.			
No later than three months following the end of the tap sampling period, for tap samples used to calculate the 90th percentile value as described in § 141.86, an example copy of the consumer notification provided and a certification that the notification has been distributed in a manner consistent with the requirements of § 141.85(d).	40 CFR § 141.90(f)(3)(i)	35 Ill. Adm. Code 611.360(f)(3)(A) No later than three months following the end of the tap sampling period, for tap samples used to calculate the 90th percentile value described in Section 611.356, a copy of the consumer notice provided and certification the notice has been distributed consistent with the requirements of Section 611.355(d).	Typographical issue: Add “that” between the highlighted words “certification” and “the”.

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

Subpart Q—Public Notification of Drinking Water Violations						
40 CFR 141.202 Tier 1 Public Notice-Form, manner, and frequency of notice.						
Appendix B to Subpart Q of Part 141—Standard Health Effects Language for Public Notification Contaminant / MCLG[1] mg/L / MCL[2] mg/L / Standard health effects language for public notification **National Primary Drinking Water Regulations (NPDWR)** * * * * * **D. Lead and Copper Rule** 23. Lead — Zero — TT[13] — There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreases in IQ and attention span. Lead exposure can also result in new or worsened learning and behavior problems. The children of persons who are exposed to lead before or during pregnancy may be at increased risk of these harmful health effects. Adults have increased risks of heart disease, high blood pressure, kidney or nervous system problems. Contact your health care provider for more information about your risks. * * * * * 1. MCLG–Maximum contaminant level goal. 2. MCL–Maximum contaminant level. * * * * * 13. Action Level = 0.010 mg/L * * * * *	Appendix B to Subpart Q of Part 141	**Section 611.APPENDIX A Regulated Contaminants** Contaminant (units): Lead (ppb) Traditional MCL in mg/ℓ: TT, AL=0.010~~AL=0.015~~ To convert for CCR, multiply by: 1000 MCL in CCR units: TT, AL=10~~AL=15~~ MCLG: 0 Major sources in drinking water: Corrosion of household plumbing systems and service lines connecting buildings to water mains,~~;~~ erosion of natural deposits. Health effects language: There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, Infants and children especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreases in IQ and attention span. Lead exposure can also result in new or worsened learning and behavior problems. The children of persons who are exposed to lead before or during pregnancy may be at increased risk of these harmful health effects. Adults have increased risks of heart disease, high blood pressure, kidney or nervous system problems. Contact your health care provider for more information about your risks. ~~who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.~~ ** No State Appendix A endnotes. Key Abbreviation — Meaning MCL — maximum contaminant level	**LCRI and LCRR** **Stringency Concern.** The state health effects language must exactly mirror the federal text. Please strike the phrase “infants and children” in the third line of the first sentence of the state rule.

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

40 CFR 142.62 Variances and exemptions from the maximum contaminant levels for organic and inorganic chemicals.

Per the EPA HQ template, EPA comments are included in the third column because Variances and Exemptions fall under 40 C.F.R. § 142.

The public water system is fully responsible for the provision of sufficient quantities of bottled water to every person supplied by the public water system via door-to-door bottled water delivery.	40 CFR § 142.62(g)(3)	35 Ill. Adm. Code 611.130(d)(6) **(LCRI)** The supplier must provide sufficient quantities of bottled water to every affected person the supplier serves via door-to-door bottled water delivery. **EPA Previous Stringency Question.** The federal rule requires providing bottled water to every person, while the state rule qualifies this in only providing bottled water to those affected that are served by the PWS. What agency or entity decides which people are affected, and what are the criteria for that determination? (Will this be determined by the state as a term of the variance or adjusted standard?) **IPCB Response (8/10/26):** The Board declines to modify 35 Ill. Adm. Code 611.130(d)(1). The rule states, "the supplier must develop a monitoring program" and 35 Ill. Adm. Code 611.130(d)(2) and (d)(3) address annual results and reporting as specified in 40 CFR 142.62(g)(1). As such, the regulations in subsections(d)(1) through (3) are IIS and as stringent as NPDWRs. 35 Ill. Adm. Code 611.130(d)(6) states that "[t]he supplier must provide sufficient quantities of bottled water to every affected person the supplier serves via door-to-door bottled water delivery." Therefore, the Board declines to modify 35 Ill. Adm. Code 611.130(d)(6) because the rule is identical-in-substance to the NPDWRs. **EPA Comment (10/5/26):** The Board did not address the EPA stringency concern that the state rule only requires providing bottled water to every affected person. The federal rule does not constrain who receives bottled water by determining who is affected. The state rule remains less stringent. Given economic constraints, this section would usually only be an elective by small systems that would rather provide bottled water as a condition of a variance than utilize OCCT. While this regulation applies to exemptions/variances for rules other than LCR. "every affected person" may be reasonable in the context of LCR; however, Sections 141.61 and 141.62 apply to other contaminants that may have the potential to impact all persons served, and all persons served should be protected. (e.g., VOCs, SOCs, PFAS, inorganics).

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
Lead and Copper Rules (LCR, LCR-MR, LCR-STR) – Draft and Existing Illinois Regulations under Subpart AG			
(Per the EPA LCR-STR Crosswalk, States have the option of adopting federal provisions preceded with the symbol) ★			
Public education materials of CWSs and NTNCWSs that serve a large proportion of non-English speaking consumers, as determined by the State, must include information in the appropriate language(s) regarding the importance of the notice, or where they obtain a translated copy of the public education materials or request assistance.	40 CFR § 141.85(b)(1)	35 Ill. Adm. Code 611.1355(b)(1) The public education materials of a supplier serving a large proportion of non-English-speaking consumers must contain information in the appropriate languages regarding the importance of the notice, or the materials must contain a telephone number or address where a water consumer may contact the supplier to obtain a translated copy of the public education materials or to request assistance in the appropriate language.	**LCR-STR, LCRR** **Stringency concern.** The Board revision did not address the EPA stringency concern. The state rule does not specify that the State determines if there is a large portion of non-English speaking consumers that require PE in that language. **This issue also occurs in LCRR at 35 Ill. Adm. Code 611.2355(b)(1),** which will adversely affect the Illinois LCRR/LCRI joint primacy request. The parallel stringency concern in the state LCRR rules is reflected below in the table for Subpart AH. If 35 Ill. Adm. Code 611.1355(b)(1) is no longer in effect, please address this stringency concern in 35 Ill. Adm. Code 611.2355(b)(1).
• NTNCWSs must repeat the task in paragraph (b)(4) at least once during each calendar year in which it exceeds the lead action level. ★ State may extend the activities in paragraph (b)(4) beyond the 60-day requirement if the extension is approved in writing by the State in advance of the 60-day deadline.	40 CFR § 141.85(b)(5)	35 Ill. Adm. Code 611.1355(b)(5) A NTNCWS supplier must repeat the tasks in subsection (b)(4) at least once during each calendar year in which the supplier exceeds the lead action level. The Agency must, on a case-by-case basis, issue a SEP extending the time for the supplier to complete the public education tasks in subsection (b)(2) beyond the 60-day limit if the Agency determines that the extended time is needed for implementation purposes; however, the Agency must issue any SEP granting any extension prior to when the 60-day deadline expires.	**LCR-STR, LCRR** **Stringency concern.** The Board revision did not address the EPA stringency concern. The state rule includes an incorrect citation regarding an optional practice that the state is electing to take. Revise the citation to Section 611.1355(b)(2) to read Section 611.1355(b)(4). (Note: was formerly 35 Ill. Adm. Code 611.1355(b)(4)(C).) **This stringency concern also occurs in LCRR at 35 Ill. Adm. Code 611.2355(b)(5)**, which means this problem will remain a stringency concern that adversely affects the Illinois LCRR/LCRI primacy request.

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
			The parallel stringency concern in the state LCRR rules is reflected in the table for Subpart AH below. If 35 Ill. Adm. Code 611.1355(b)(5) is no longer in effect, please address this stringency concern in 35 Ill. Adm. Code 611.2355(b)(5).
• PWSs with fewer than five drinking water taps that can be used for human consumption must collect at least one sample from each tap and collect additional samples from those taps on different days during the monitoring period. Alternatively, the State can provide written approval for these systems to collect fewer than five samples if all taps that can be used for human consumption are sampled. Water systems shall collect at least one sample during each monitoring period specified in paragraph (d) of this section from the number of sites listed in the first column ("standard monitoring") of the table in this paragraph. A system conducting reduced monitoring under paragraph (d)(4) of this section shall collect at least one sample from the number of sites specified in the second column ("reduced monitoring") of the table in this paragraph during each monitoring period specified in paragraph (d)(4) of this section. Such reduced monitoring sites shall be representative of the sites required for standard monitoring. A public water system that has fewer than five drinking water taps, that can be used for human consumption meeting the sample site criteria of paragraph (a) of this section to reach the required number of sample sites listed in paragraph (c) of this section, must collect at least one sample from each tap and then must collect additional samples from those taps on different days during the monitoring period to meet the required number of sites. Alternatively, the State may allow these public water systems to collect a number of samples less than the number of sites specified in paragraph (c) of this section, provided that 100 percent of all taps that can be used for human consumption are sampled. The State must approve this reduction of the minimum number of samples in writing based on a request from the system or onsite verification by the State. States may specify sampling locations when a system is conducting reduced monitoring. The table is as follows: System size (# of people served) / # of sites (standard monitoring) / # of sites (reduced monitoring) >100,000 / 100 / 50 10,001 to 100,000 / 50 / 30 3,301 to 10,000 / 40 / 20 501 to 3,300 / 20 / 10 101 to 500 / 10 / 5 ≤100 / 5 / 5	40 CFR § 141.86(c)	35 Ill. Adm. Code 611.1356(c)(2) A supplier conducting reduced monitoring under subsection (d)(4) must collect one sample each from the number of sites in the second column of Table D (labelled "reduced monitoring") during each reduced monitoring period subsection (d)(4) specifies. The reduced monitoring sites must represent the sites standard monitoring requires. A supplier whose system has fewer than five drinking water taps capable of use for human consumption that meet the sampling site criteria of subsection (a) must collect multiple samples from individual taps to reach the required number of sampling sites Table D requires. To accomplish this, the supplier must collect at least one sample from each tap, then additional samples from those taps on different days during the monitoring period, to collect a total number of samples meeting the required number of sampling sites. Alternatively, the Agency may issue a SEP allowing the supplier whose system has fewer than five drinking water taps to collect a number of samples that is fewer than the number of sites this subsection (c) specifies if the Agency determines that the supplier samples 100 percent of all taps capable of use for human consumption and that the reduced number of samples will produce the same results as collecting multiple samples from some taps. The Agency must base any approval of reducing the minimum number of samples on a request from the supplier or Agency on on-site verification. The Agency may specify sampling locations in a SEP when a system conducts reduced monitoring.	**LCR-MR, LCR-STR, LCRR Stringency concern.** Section 611.1356(c)(2) refers to columns in Table D, but the table is not included in Section 611.1356. Insert the table found in the federal regulations at the end of 40 CFR 141.86(c). The Board revision did not address the EPA stringency concern. See above. **This stringency concern also occurs in LCRR at 35 Ill. Adm. Code 611.2356(c)(2), which means it will adversely affect the Illinois LCRR/LCRI primacy request**. If 35 Ill. Adm. Code 611.1356(c)(2) is no longer in effect, please address this stringency concern in 35 Ill. Adm. Code 611.2356(c)(2).
[For systems on a State-specified alternate reduced monitoring period, the monitoring must begin during the State-specified period: in the calendar year immediately following the end of the second consecutive six-month monitoring period for systems initiating annual monitoring; and during the three-year period following the end of the third	40 CFR § 141.86(d)(4)(iv)(A)	35 Ill. Adm. Code 611.1356(d)(4)(D)(i) The Agency may grant a SEP approving a different period for a supplier to conduct lead and copper tap sampling to a system collecting a reduced number of samples. The duration of the period must not exceed four consecutive months and must represent a time of normal	**LCR-STR and LCRR Stringency concern.** The Board revision did not address the EPA stringency concern, which

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
consecutive calendar year of annual monitoring for systems initiating triennial monitoring.] The State, at its discretion, may approve a different period for conducting the lead and copper tap sampling for systems collecting a reduced number of samples. Such a period shall be no longer than four consecutive months and must represent a time of normal operations where the highest levels of lead are most likely to occur. For a non-transient non-community water system that does not operate during the months of June through September, and for which the period of normal operation where the highest lead levels are most likely to occur is not known, the State shall designate a period that represents a time of normal operation for the system. This sampling shall begin during the period approved or designated by the State in the calendar year immediately following the end of the second consecutive six-month monitoring period for systems initiating annual monitoring and during the three-year period following the end of the third consecutive calendar year of annual monitoring for systems initiating triennial monitoring.		operation when the highest lead levels are most likely to occur. For a NTNCWS supplier not operating during any of June through September and whose normal operating period when the highest levels of lead are most likely to occur is not known, the Agency must designate a period that represents a time of normal operation for the system. This reduced sampling may only begin during the Agency-designated period in the calendar year immediately following the end of the second consecutive six-month monitoring period, for a system initiating annual monitoring, or in the three-year period following the end of the third consecutive calendar year of annual monitoring, for a supplier initiating triennial monitoring.	was raised in the original EPA comment on the state rulemaking re: LCR-STR. The last sentence, 5th line from the bottom of the paragraph, should read "and/or" and not "'or' may resume monitoring once every three…" EPA Note: The highlighted "or" should be expressed as "and/or" in that: ▪ A system that is on reduced monitoring for Pb/Cu, and has an ALE, goes back to standard monitoring for Pb/Cu. ▪ A system that is on reduced monitoring for Pb/CU, and has WQPs out of range (for more than 9 days in a 6-month period), goes back to standard monitoring for Pb/Cu. A system could be triggered back to standard Pb/Cu monitoring for either, or both, of the reasons above. **The same concern appears under Subpart AH (LCRR) in 35 Ill. Adm. Code 611.2356(d)(4)(A)(i), which will adversely affect the Illinois LCRR/LCRI primacy request**. If 35 Ill. Adm. Code 611.1356(d)(4)(D)(i) is no longer in effect, please address this stringency concern in 35 Ill. Adm. Code 611.2356(d)(4)(A)(i).
[Systems using ground water sources only must collect source water lead and copper samples once during the three-year compliance period (as that term is defined in § 141.2) in effect when State specifies maximum permissible levels (MPLs) for lead and copper in source water or determines that no source water treatment is needed. Triennial source water samples must be collected every third calendar year.] A water system using only groundwater shall collect samples once during the three-year compliance period (as that term is defined in § 141.2) in effect when the applicable State determination under paragraph (d)(1) of this section is made. Such systems shall conduct samples once during each subsequent compliance period. Triennial samples shall be collected every third calendar year.	40 CFR § 141.88(d)(1)(i)	35 Ill. Adm. Code 611.1358(d)(1)(A) GWS Suppliers 35 Ill. Adm. Code 611.1358(d)(1)(A)(i) A GWS supplier sampling under subsection (d)(1) must collect samples once during the three-year compliance period (as Section 611.101 defines the term) during which the Agency makes its determination under Section 611.1353(b)(4) or 611.1353(b)(2). 35 Ill. Adm. Code 611.1358(d)(1)(A)(ii)	**LCR-STR, LCRR Stringency concern.** **The Board revision did not address the EPA stringency concern.** Federal regulation cites to paragraph (d)(1) of this section, while the state section specifies that the Agency makes its determination under Section 611.1353(b)(2) or (b)(4). The parallel state provision to 40 CFR

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SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
		A GWS supplier sampling under subsection (d)(1) must sample once during each subsequent compliance period. 35 Ill. Adm. Code 611.1358(d)(1)(A)(iii) A supplier must collect triennial samples every third calendar year.	141.88(d)(1) is this section at 35 Ill. Adm. Code 611.1358(d)(1). **Even if Section 611.1358(d)(1)(A)(i) sunsets, this issue will still persist in the surviving rules under LCRR (35 Ill. Adm. Code 611.2358(d)(1)(A)(i) and pose a stringency concern with the LCRR/LCRI primacy request.** If 35 Ill. Adm. Code 611.1358(d)(1)(A)(i) is no longer in effect, please address this stringency concern in 35 Ill. Adm. Code 611.2358(d)(1)(A)(i).

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SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
Lead and Copper Rule Revisions (Illinois Proposed Subpart AH)			
Data and documentation showing that a particular corrosion control treatment has adversely affected other drinking water treatment processes when used by another water system with comparable water quality characteristics. Systems using coupon studies to screen and/or pipe loop/rig studies to evaluate treatment options must not exclude treatment strategies from the studies based on the constraints identified in this section.	40 CFR § 141.82(c)(2)(iv)(A)	35 Ill. Adm. Code 611.2352(c)(2)(D)(i) Data and documents showing that a particular corrosion control treatment adversely affected other drinking water treatment processes when another supplier with comparable water quality characteristics used the treatment. A supplier using coupon studies to screen or pipe loop/rig studies to evaluate treatment options must not exclude treatment strategies from the studies based on the constraints the supplier identifies under this Section; or	**LCRR** **Stringency concern.** (Raised in Illinois LCRR proceeding.) **IPCB Comment (8/10/26):** As noted above in the USEPA stringency concern number 8, use of "and/or" versus "or", the Board declines to modify subsections 35 Ill. Adm. Code 611.2352(c)(2)(D)(i) and 35 Ill. Adm. Code 611.2352(c)(2)(E). **EPA Comment (10/5/26):** The Board revision did not address the EPA stringency concern. The use of "or" is less stringent in that it does not apply the requirement to systems that use both coupon studies and pipe loop/rig studies. This is an actual concern in that some Illinois systems have conducted both coupon and pipe loop studies. If the Board elects to not use "and/or", it could resolve this concern by stating "using either coupon studies to screen or pipe loop/rig studies, or both to…". If a system uses both, it still must not exclude treatment strategies from studies.
The water system must evaluate the effect of the chemicals used for corrosion control treatment on other drinking water quality treatment processes. Systems using coupon studies to screen and/or pipe loop/rig studies to evaluate treatment options shall not exclude treatment strategies from the studies based on the effects identified in this section.	40 CFR § 141.82(c)(2)(v)	35 Ill. Adm. Code 611.2352(c)(2)(E) The supplier must evaluate the effect of the chemicals it uses for corrosion control treatment on other drinking water quality treatment processes. A supplier using coupon studies to screen or pipe loop/rig studies to evaluate treatment options must not exclude treatment strategies from the studies based on the effects the supplier identifies under this Section.	**LCRR** **Stringency concern.** (Raised in Illinois LCRR proceeding.) **IPCB Comment (8/10/26):** As noted above in the USEPA stringency concern number 8, use of "and/or" versus "or", the Board declines to modify subsections 35 Ill. Adm. Code 611.2352(c)(2)(D)(i) and 35 Ill. Adm. Code 611.2352(c)(2)(E). **EPA Comment (10/5/26):** The Board revision did not address the EPA stringency concern. The use of "or" is less stringent in that it does not apply

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			the requirement to systems that use both coupon studies and pipe loop/rig studies. This is an actual concern in that some Illinois systems have conducted both coupon and pipe loop studies. If the Board elects to not use "and/or", it could resolve this concern by stating "using either coupon studies to screen or pipe loop/rig studies, or both to…". If a system uses both, it still must not exclude treatment strategies from studies.
Public education materials of CWSs and NTNCWSs that serve a large proportion of non-English speaking consumers, as determined by the State, must include information in the appropriate language(s) regarding the importance of the notice, or where they obtain a translated copy of the public education materials or request assistance.	40 CFR § 141.85(b)(1)	35 Ill. Adm. Code 611.2355(b)(1) The public education materials of a supplier serving a large proportion of non-English-speaking consumers must contain information in the appropriate languages regarding the importance of the notice, or the materials must contain a telephone number or address where a water consumer may contact the supplier to obtain a translated copy of the public education materials or to request assistance in the appropriate language.	**LCR-STR, LCRR** **Stringency concern.** The Board revision did not address the EPA stringency concern. The state rule does not specify that the State determines if there is a large portion of non-English speaking consumers that require PE in that language. This issue was carried over from 35 Ill. Adm. Code 611.1355(b)(1), which is shown under the table regarding Subpart AG above. **This stringency concern will adversely affect the Illinois LCRR/LCRI joint primacy request.**
A non-transient non-community water system must repeat the tasks contained in paragraph (b)(4) of this section until the system is at or below the lead action level based on tap water samples collected in accordance with § 141.86. These repeated activities must be completed within 60 days of the end of each tap sampling period. A calculated 90th percentile level at or below the lead action level based on fewer than the minimum number of required samples under § 141.86 cannot be used to meet the requirements of this provision.	40 CFR § 141.85(b)(5)	35 Ill. Adm. Code 611.2355(b)(5) A NTNCWS supplier must repeat the tasks in subsection (b)(4) at least once during each calendar year in which the supplier exceeds the lead action level. The Agency must, on a case-by-case basis, issue a SEP extending the time for the supplier to complete the public education tasks in subsection (b)(2) beyond the 60-day limit if the Agency determines that the extended time is needed for implementation purposes; however, the Agency must issue any SEP granting any extension prior to when the 60-day deadline expires.	**LCR-STR, LCRR** **Stringency concern.** The Board revision did not address the EPA stringency concern. This issue was carried over from the original provision under Subpart AH. The state rule includes an incorrect citation regarding an optional practice that the state is electing to take. Revise the citation to Section 611.2355**(b)(2)** to read Section 611.2355**(b)(4)**. (The citation was formerly 35 Ill. Adm. Code 611.1355(b)(4)(C).) **This stringency concern will adversely affect the Illinois LCRR/LCRI primacy request.**

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<table>
<tr><th>SUMMARY OF FEDERAL REQUIREMENT</th><th>FEDERAL CITATION</th><th>STATE REGULATORY CITATION AND TEXT</th><th>EPA REGION 5 TECHNICAL COMMENT
Not Determinative
Not a Primacy Review</th></tr>
<tr><td>• PWSs with fewer than five drinking water taps that can be used for human consumption must collect at least one sample from each tap and collect additional samples from those taps on different days during the monitoring period. Alternatively, the State can provide written approval for these systems to collect fewer than five samples if all taps that can be used for human consumption are sampled.
Water systems shall collect at least one sample during each monitoring period specified in paragraph (d) of this section from the number of sites listed in the first column (“standard monitoring”) of the table in this paragraph. A system conducting reduced monitoring under paragraph (d)(4) of this section shall collect at least one sample from the number of sites specified in the second column (“reduced monitoring”) of the table in this paragraph during each monitoring period specified in paragraph (d)(4) of this section. Such reduced monitoring sites shall be representative of the sites required for standard monitoring. A public water system that has fewer than five drinking water taps, that can be used for human consumption meeting the sample site criteria of paragraph (a) of this section to reach the required number of sample sites listed in paragraph (c) of this section, must collect at least one sample from each tap and then must collect additional samples from those taps on different days during the monitoring period to meet the required number of sites. Alternatively, the State may allow these public water systems to collect a number of samples less than the number of sites specified in paragraph (c) of this section, provided that 100 percent of all taps that can be used for human consumption are sampled. The State must approve this reduction of the minimum number of samples in writing based on a request from the system or onsite verification by the State. States may specify sampling locations when a system is conducting reduced monitoring. The table is as follows:
<table>
<tr><th>System size (# of people served)</th><th># of sites (standard monitoring)</th><th># of sites (reduced monitoring)</th></tr>
<tr><td>>100,000</td><td>100</td><td>50</td></tr>
<tr><td>10,001 to 100,000</td><td>50</td><td>30</td></tr>
<tr><td>3,301 to 10,000</td><td>40</td><td>20</td></tr>
<tr><td>501 to 3,300</td><td>20</td><td>10</td></tr>
<tr><td>101 to 500</td><td>10</td><td>5</td></tr>
<tr><td>≤100</td><td>5</td><td>5</td></tr>
</table></td><td>40 CFR § 141.86(c)</td><td>35 Ill. Adm. Code 611.2356(c)(2)
A supplier conducting reduced monitoring under subsection (d)(4) must collect one sample each from the number of sites in the second column of Table D (labelled “reduced monitoring”) during each reduced monitoring period subsection (d)(4) specifies. The reduced monitoring sites must represent the sites standard monitoring requires. A supplier whose system has fewer than five drinking water taps capable of use for human consumption that meet the sampling site criteria of subsection (a) must collect multiple samples from individual taps to reach the required number of sampling sites Table D requires. To accomplish this, the supplier must collect at least one sample from each tap, then additional samples from those taps on different days during the monitoring period, to collect a total number of samples meeting the required number of sampling sites. Alternatively, the Agency may issue a SEP allowing the supplier whose system has fewer than five drinking water taps to collect a number of samples that is fewer than the number of sites this subsection (c) specifies if the Agency determines that the supplier samples 100 percent of all taps capable of use for human consumption and that the reduced number of samples will produce the same results as collecting multiple samples from some taps. The Agency must base any approval of reducing the minimum number of samples on a request from the supplier or Agency on on-site verification. The Agency may specify sampling locations in a SEP when a system conducts reduced monitoring.</td><td>LCR-MR, LCR-STR, LCRR Stringency concern.

The Board revision did not address the EPA stringency concern. Section 611.1356(c)(2) refers to columns in Table D, but the table is not included in Section 611.1356. Insert the table found in the federal regulations at the end of 40 CFR 141.86(c). This stringency concern was carried over from 35 Ill. Adm. Code 611.1356(c)(2) (see Subpart AG above) and will adversely affect the Illinois LCRR/LCRI primacy request.</td></tr>
<tr><td>The State, at its discretion, may approve a different period for conducting the lead and copper tap sampling for systems collecting a reduced number of samples. Such a period shall be no longer than four consecutive months and must represent a time of normal operations where the highest levels of lead are most likely to occur. For a non-transient non-community water system that does not operate during the months of June through September, and for which the period of normal operation where the highest lead levels are most likely to occur is not known, the State shall designate a period that represents a time of normal operation for the system. This sampling shall begin during the period approved or designated by the State in the calendar year immediately following the end of the second consecutive six-month monitoring period for systems initiating annual monitoring and during the three-year period following the end of the third consecutive calendar year of annual monitoring for systems initiating triennial monitoring.</td><td>40 CFR § 141.86(d)(4)(iv)(A)</td><td>35 Ill. Adm. Code 611.2356(d)(4)(A)(i)
The Agency may grant a SEP approving a different tap sampling period for conducting lead and copper tap sampling to a supplier collecting samples at a reduced frequency. The duration of the period must not exceed four consecutive months within one calendar year and must represent a time of normal operation when the highest lead levels are most likely to occur. For a NTNCWS supplier not operating during any of the months June through September and whose normal operating period when the highest levels of lead are most likely to occur is not known, the Agency must designate a period that represents a time of normal operation for the system. This reduced monitoring can only begin during the Agency-designated period in the calendar year</td><td>LCR-STR and LCRR Stringency concern.

The Board revision did not address the EPA stringency concern, which was raised in the original EPA comment on the state rulemaking re: LCR-STR. The last sentence, 5th line from the bottom of the paragraph, should read “and/or” and not “‘or’ may resume monitoring once every three…”</td></tr>
</table>

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		immediately following the end of the second six-month tap monitoring period, for a supplier initiating annual monitoring, or in the three-year period following the end of the third consecutive year of annual monitoring, for a supplier initiating triennial monitoring.	EPA Note: The highlighted "or" should be expressed as "and/or" in that: ▪ A system that is on reduced monitoring for Pb/Cu, and has an ALE, goes back to standard monitoring for Pb/Cu. ▪ A system that is on reduced monitoring for Pb/CU, and has WQPs out of range (for more than 9 days in a 6-month period), goes back to standard monitoring for Pb/Cu. A system could be triggered back to standard Pb/Cu monitoring for either, or both, of the reasons above. **This issue was carried over from Subpart AG (LCR/LCR-MR, LCR-STR) in 35 Ill. Adm. Code 611.1356(d)(4)(A)(i) and will adversely affect the Illinois LCRR/LCRI primacy request**.
Monitoring criteria for waiver issuance. The system must have completed at least one 6-month round of standard tap water monitoring for lead and copper at sites approved by the State and from the number of sites required by paragraph (c) of this section and demonstrate that the 90th percentile levels for any and all rounds of monitoring conducted since the system became free of all lead-containing and/or copper-containing materials, as appropriate, meet the following criteria.	40 CFR § 141.86(g)(2)	35 Ill. Adm. Code 611.2356(g)(2) Monitoring Criteria for Waiver Issuance. The supplier must have completed at least one six-month round of standard tap water monitoring for lead and copper at Agency-approved sites and from the number of sites subsection (c) requires and demonstrate to the Agency that the 90th percentile concentrations for any and all rounds of monitoring conducted since the system became free of all lead-containing or copper-containing materials, as appropriate, meet certain criteria:	**LCRR** **Stringency concern.** **IPCB Comment (8/10/26):** As noted above in the USEPA stringency concern number 8, use of "and/or" instead of "or", the Board declines to modify subsection 35 Ill. Adm. Code 611.2356(g)(2) as suggested. **EPA Comment (10/5/26):** The Board did not address the EPA stringency concern. The "and/or" in the federal provision is inclusive, while the State's use of "or" could be construed as exclusive. The system is to be free of both lead and copper material if both are present. If the Board does not use "and/or", it could resolve this issue by substituting "or" with "and" so that systems must be free of both lead- and copper-containing material.

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SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
A water system using only groundwater shall collect samples once during the three-year compliance period (as that term is defined in 40 CFR 141.2) in effect when the applicable State determination under paragraph (d)(1) of this section is made. Such systems shall collect samples once during each subsequent compliance period. Triennial samples shall be collected every third calendar year. A water system using surface water (or a combination of surface and ground water) shall collect samples once during each calendar year, the first annual monitoring period to begin during the year in which the applicable State determination is made under paragraph (d)(1) of this section.	40 CFR § 141.88(d)(1)(i) 40 CFR § 141.88(d)(1)(ii)	35 Ill. Adm. Code 611.2358(d)(1)(A) GWS Suppliers 35 Ill. Adm. Code 611.2358(d)(1)(A)(i) A GWS supplier sampling under subsection (d)(1) must collect samples once during the three-year compliance period (as Section 611.101 defines the term) during which the Agency makes its determination under Section 611.2353(b)(4). 35 Ill. Adm. Code 611.2358(d)(1)(A)(ii) A GWS supplier sampling under subsection (d)(1) must sample once during each subsequent compliance period.	**LCR-STR, LCRR** **Stringency concern.** Section 141.88(d)(1)(i) under the federal rules cites to paragraph (d)(1) of this section, while the state section specifies that the Agency makes its determination under Section 611.2353(b)(4). The parallel state provision to 40 CFR § 141.88(d)(1) is this section at 35 Ill. Adm. Code 611.2358(d)(1). The Board revision did not address the EPA stringency concern, which occurs in Subpart AG (LCR/LCR-MR/LCR-STR) at **35 Ill. Adm. Code 611.1358(d)(1)(A)(i)**. Even if Section 611.1358 is no longer applicable, this issue will still persist in the surviving state rules regarding LCRR and pose a stringency concern with the LCRR/LCRI primacy request. Since LCRI builds upon LCRR, LCR-MR, and LCR-STR, the outstanding stringency concerns will delay any potential grant of primacy on a request that includes all four rules before 2028.

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Subpart O—Consumer Confidence Reports (Includes Consumer Confidence Report Rule Revisions, PFAS, and LCRI Provisions)			
40 CFR 141.151 Purpose and applicability of this subpart.			
(See Appendix A) For the purpose of this subpart, detected means: at or above the levels prescribed by § 141.23(a)(4) for inorganic contaminants, at or above the levels prescribed by § 141.24(f)(7) for the contaminants listed in § 141.61(a), at or above the levels prescribed by § 141.24(h)(18) for the contaminants listed in § 141.61(c) (except PFAS), at or above the levels prescribed by § 141.131(b)(2)(iv) for the contaminants or contaminant groups listed in § 141.64, at or above the levels prescribed by § 141.25(c) for radioactive contaminants, and at or above the levels prescribed in § 141.902(a)(5) for PFAS listed in § 141.61(c).	40 CFR § 141.151(d)	35 Ill. Adm. Code 611.881(d) For the purpose of this Subpart U, "detected" means the following: at or above the detection limit levels prescribed by Section 611.600(d) for inorganic contaminants; at or above the levels prescribed by Section 611.646(g) for the contaminants listed in Section 611.646(a), ~~for~~ Phase I, II, and V VOCs; at or above the levels prescribed by Section 611.648(r) for Phase II, IIB, and V SOCs (except for PFAS) at or above the levels prescribed by Section 611.381(b)(2)(D) for the disinfection byproducts listed in Section 611.312; ~~and~~ at or above the levels prescribed by Section 611.720(c)(2)~~Section 611.720(c)(3)~~ for radioactive contaminants; and at or above the levels prescribed by Section 611.7902(a)(5) for PFAS listed in Section 611.311(c)(2). BOARD NOTE: Derived from 40 CFR 141.151. (Source: Amended at 50 Ill. Reg. _____, effective _____)	**CCR3 Rule / PFAS Crosswalk** (Included in PFAs Rule) **Typographical issue:** In the first sentence, a semicolon should be inserted after "(except for PFAS)" and before "at or above the levels".
40 CFR 141.153 Content of the reports.			
Systems must use the following definitions for the terms listed below if the terms are used in the report unless the system obtains written approval from the state to use an alternate definition:	40 CFR § 141.153(c)(5)	35 Ill. Adm. Code 611.883(c)(5) Suppliers must use the following definitions for the terms listed below if the terms are used in the report unless the supplier obtains written approval form the Agency to use an alternate definition:	**CCR** **Typographical issue**: "form" should read "from" to parallel the federal rule
The data must be derived from data collected to comply with EPA and State monitoring and analytical requirements during the previous calendar year, or the most recent calendar year before the previous calendar year except that:	40 CFR § 141.153(d)(3)	35 Ill. Adm. Code 611.883(d)(3) The supplier must derive the data in the report from data it collected to comply with monitoring and analytical requirements during the previous calendar year or the most recent calendar year before the previous calendar year except that:	**CCR** **Typographical issue**: Missing a colon.
If there is no MCL for a detected contaminant, the contaminant data section(s) must indicate that there is a treatment technique, or specify the action level, applicable to that contaminant, and the report must include the definitions for treatment technique and/or action level, as appropriate, specified in paragraph (c)(3) of this section;	40 CFR § 141.153(d)(4)(iii)	35 Ill. Adm. Code 611.883(d)(4)(C) If there is no MCL for a detected contaminant, the contaminant data section(s) must indicate that there is a treatment technique or specify the action level for the contaminant, and the report must include the applicable of the definitions for treatment technique or action level that subsection (c)(3) specifies;	**CCR** **Typographical issue**: Strike "applicable of the" in the state rule.
For contaminants subject to an MCL, except turbidity and *E. coli,* the contaminant data section(s) must contain the highest contaminant level used to determine compliance with an NPDWR and the range of detected levels, as follows:	40 CFR § 141.153(d)(4)(iv)	35 Ill. Adm. Code 611.883(d)(4)(D) For contaminants subject to an MCL, except turbidity and E. coli, the contaminant data sections must contain the highest contaminant level the supplier used to determine compliance with the applicable NPDWR and the range of detected levels as follows:	**CCR** **Typographical issue:** Revise "sections" to read "section(s)".
Inorganic contaminants, such as salts and metals, which can occur naturally in the soil or groundwater or may result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.	40 CFR § 141.153(h)(1)(ii)(B)	35 Ill. Adm. Code 611.883(h)(1)(B)(ii) Inorganic contaminants, such as salts and metals, which can occur naturally in the soil or groundwater or may result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming;	**CCR** **Typographical issue:** The semicolon should be a period.
Any ground water system that receives notice from the State of a significant deficiency or notice from a laboratory of a fecal indicator-positive ground water source sample that is not invalidated by the State under § 141.402(d) must inform its customers of any significant deficiency that is uncorrected at the time of the next reporting period or of any fecal indicator-positive ground water source sample in the next report or 6-month update according to § 141.155. The system must continue to inform the public annually until the State determines that particular significant deficiency is corrected or the fecal	40 CFR § 141.153(h)(6)(i)	35 Ill. Adm. Code 611.883(h)(6)(A) Any GWS supplier that written notice from the Agency of a significant deficiency or notice from a laboratory of a fecal indicator-positive ground water source sample that is not invalidated by the Agency under Section 611.802(d) must inform its customers of any significant deficiency that is uncorrected at the time of the next period or of any fecal indicator-positive groundwater source sample in the next report or 6-month updated in compliance with Section 611.885 The	**CCR** **Typographical issue**: Include a period after 611.885. Include reporting between next and period.

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SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
contamination in the ground water source is addressed under § 141.403(a). Each report must include the following elements:		supplier must continue to inform the public annually until the Agency determines that the particular significant deficiency is corrected or the fecal contamination in the groundwater source is addressed under Section 611.803(a). Each report must include the following elements:	
Because we found coliforms during sampling, we were required to conduct [INSERT NUMBER OF LEVEL 1 ASSESSMENTS] assessment(s) of the system, also known as a Level 1 assessment, to identify possible sources of contamination. [INSERT NUMBER OF LEVEL 1 ASSESSMENTS] Level 1 assessment(s) were completed. In addition, we were required to take [INSERT NUMBER OF CORRECTIVE ACTIONS] corrective actions and we completed [INSERT NUMBER OF CORRECTIVE ACTIONS] of these actions.	40 CFR § 141.153(h)(7)(i)(B)	35 Ill. Adm. Code 611.883(h)(7)(A)(ii) ~~"During the past year we were required to conduct [insert number of Level 1 assessments] Level 1 assessment(s). [insert number of Level 1 assessments] Level 1 assessment(s) were completed. In addition, we were required to take [insert number of corrective actions] corrective actions and we completed [insert number of corrective actions] of these actions."~~ "Because we found coliforms during sampling, we were required to conduct [INSERT NUMBER OF LEVEL 1 ASSESSMENTS] assessment(s) also known as a Level 1 assessment, to identify possible sources of contamination. [INSERT NUMBER OF LEVEL 1 ASSESSMENTS] Level 1 assessment(s) were completed. In addition, we were required to take [INSERT NUMBER OF CORRECTIVE ACTIONS] corrective actions and we completed [INSERT NUMBER OF CORRECTIVE ACTIONS] of these actions."	**CCR3** **Typographical issue:** The draft state rule omits "of the system" between "assessment(s) and "also known".
Because we found coliforms during sampling, we were required to conduct [INSERT NUMBER OF LEVEL 2 ASSESSMENTS] detailed assessments, also known as a Level 2 assessment, to identify possible sources of contamination. [INSERT NUMBER OF LEVEL 2 ASSESSMENTS] Level 2 assessments were completed. In addition, we were required to take [INSERT NUMBER OF CORRECTIVE ACTIONS] corrective actions and we completed [INSERT NUMBER OF CORRECTIVE ACTIONS] of these actions.	40 CFR § 141.153(h)(7)(i)(C)	35 Ill. Adm. Code 611.883(h)(7)(A)(iii) "Because we found coliforms during sampling, we were required to conduct [INSERT NUMBER OF LEVEL 2 ASSESSMENTS] detailed assessments, also known as a Level 2 assessment, to identify possible sources of contamination. [INSERT NUMBER OF LEVEL 2 ASSESSMENTS] Level 2 assessments were completed. In addition, we were required to take [INSERT NUMBER OF CORRECTIVE ACTIONS] corrective actions and we completed [INSERT NUMBER OF CORRECTIVE ACTIONS] of these actions~~During the past year [insert number of Level 2 assessments] Level 2 assessments were required to be completed for our water system. [insert number of Level 2 assessments] Level 2 assessments were completed. In addition, we were required to take [insert number of corrective actions] corrective actions and we completed [insert number of corrective actions] of these actions~~."	**CCR3** **Typographical issue:** The state version omits "of the system," between "assessment(s)" and "also known as".
The report must include a statement that a service line inventory (including inventories consisting only of a statement that there are no lead, galvanized requiring replacement, or lead status unknown service lines) has been prepared and include instructions to access the publicly available service line inventory. If the service line inventory is available online, the report must include the direct link to the inventory.	40 CFR § 141.153(h)(8)(ii)	35 Ill. Adm. Code 611.883(h)(8)(B) The report must include a statement that a service line inventory (including inventories where the publicly accessible inventory consist of a written statement that there are no lead, galvanized requiring replacement, lead status unknown service lines, known lead connectors or connectors of unknown material) has been prepared and include instructions to access the publicly accessible service line inventory. If the service line inventory is available online, the report must include the direct link to the inventory.	**CCR** **Typographical issue**: "consist" should read "consists".
The report must contain a plainly worded explanation of the corrosion control efforts the system is taking in accordance with subpart I of this part. Corrosion control efforts consist of treatment (e.g., pH adjustment, alkalinity adjustment, or corrosion inhibitor addition) and other efforts contributing to the control of the corrosivity of water (e.g., monitoring to assess the corrosivity of water). The system may use one of the following templates or use their own explanation that includes equivalent information.	40 CFR § 141.153(h)(8)(iv)	35 Ill. Adm. Code 611.883(h)(8)(D) The report must contain a plainly worded explanation of the corrosion control efforts the supplier is taking in compliance with subpart G, and AH, if applicable. Corrosion control efforts consist of treatment (e.g., pH adjustment, alkalinity adjustment, or corrosion inhibitor addition) and other efforts contributing to the control of the corrosivity of water, e.g., monitoring to assess the corrosivity of water. The supplier may use one of the following templates or use their own explanation that includes equivalent information.	**CCR** **Typographical issue:** Missing parentheses that should bracket the highlighted text.

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SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
Must include a short informational statement about the impacts of nitrate on children using language such as: Even though [NAME OF UTILITY] meets the EPA nitrate drinking water standard, also known as a Maximum Contaminant Level (MCL), if you are caring for an infant and using tap water to prepare formula, you may want to use alternate sources of water or ask for advice from your health care provider. Nitrate levels above 10 ppm pose a particularly high health concern for infants under 6 months of age and can interfere with the capacity of the infant's blood to carry oxygen, resulting in a serious illness. Symptoms of serious illness include shortness of breath and blueness of the skin, known as "blue baby syndrome." Nitrate levels in drinking water can increase for short periods of time due to high levels of rainfall or agricultural activity, therefore we test for nitrate [INSERT APPLICABLE SAMPLING FREQUENCY]. The highest level for nitrate found during [YEAR] was [INSERT MAX NITRATE LEVEL per § 141.153(d)(4)(iv)] ppm.	40 CFR § 141.154(c)(1)	35 Ill. Adm. Code 611.884(c)(1) The supplier must include a short informational statement about the impacts of nitrate on children, using the following language: Even though [`NAME of SUPPLIER] meets USEPA nitrate drinking water standard, also known as Maximum Contaminant Level (MCL), if you are caring for an infant and using tap water to prepare formula, you may want to use alternate sources of water or ask for advice from your health care provider. Nitrate levels above 10 ppm pose a particularly high health concernfor infants under six months of age. and can interfere with the capacity of the infant's blood to carry oxygen, resulting in a serious illness. Symptoms of serious illness include shortness of breath and blueness of the skin, known as "blue baby syndrome." Nitrate levels in drinking water can increase for short periods of time due to high levels of rainfall or agricultural activity, therefore we test for nitrate[INSERT APPLICABLE SAMPLING FREQUENCY]. The highest level for nitrate found during [YEAR] was [INSERT MAX NITRATE LEVEL per Section 611.883(d)(4)(D)] ppm.	**CCR** **Typographical issue:** Insert a space between "concern" and "for" and delete the period after "six months of age".

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

Control of Per- and Polyflouroalkyl Substances (PFAS) (State Subparts A, C, F, Z, (and Variances and Exemptions)

SUMMARY OF FEDERAL REQUIREMENT	FEDERAL CITATION	STATE REGULATORY CITATION AND TEXT	EPA REGION 5 TECHNICAL COMMENT Not Determinative Not a Primacy Review
Subpart F – Maximum Contaminant Level Goals for Organic Contaminants			
40 CFR 141.61 Maximum contaminant levels for organic contaminants.			
Paragraph (c)(2) MCLs and HBWCs for PFAS. **CAS. No. / Contaminant / MCL (mg/l) (unless otherwise noted) / HBWC (mg/l) For hazard index calculation** (i) Not applicable — Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA) — 1 (unitless)[1] — Not applicable i) 122499-17-6 — HFPO-DA — 0.00001 — 0.00001 ii) 45187-15-3 — PFBS — No individual MCL — 0.002 v) 108427-53-8 — PFHxS — 0.00001 — 0.00001 v) 72007-68-2 — PFNA — 0.00001 — 0.00001 vi) 45285-51-6 — PFOA — 0.0000040 — Not applicable vii) 45298-90-6 — PFOS — 0.0000040 — Not applicable [1.] The PFAS Mixture Hazard Index (HI) is the sum of component hazard quotients (HQs), which are calculated by dividing the measured component PFAS concentration in water by the relevant health-based water concentration when expressed in the same units (shown in ng/l for simplification). The HBWC for PFHxS is 10 ng/l; the HBWC for HFPO-DA is 10 ng/l; the HBWC for PFNA is 10 ng/l; and the HBWC for PFBS is 2000 ng/l. Hazard Index = ([HFPO-DAwater ng/l]/[10 ng/l]) + ([PFBSwater ng/l]/[2000 ng/l]) + ([PFNAwater ng/l]/[10 ng/l]) + ([PFHxSwater ng/l]/[10 ng/l]) HBWC = health-based water concentration HQ = hazard quotient ng/l = nanograms per liter PFASwater = the concentration of a specific PFAS in water [g] *Note: This new content was originally listed on April 26, 2024, as a new table, then redesignated subparagraph (c)(2) in the technical correction published on June 11, 202*	40 CFR § 141.61(c)(2)[g]	**35 Ill. Adm. Code 611.311(c)(2)** **MCLs and HBWCs for PFAS apply to CWS and NTNCWS suppliers:** **CAS Number / Contaminant / MCL (mg/L) / HBWC (mg/L)** (Not applicable — Hazard Index (HFPO-DA, PFBS, PFHxS, and PFNA) — 1 (unitless) [1] — Not applicable 122499-17-6 — HFPO-DA — 0.00001 — 0.00001 45187-15-3 — PFBS — No individual MCL — 0.002 108427-53-8 — PFHxS — 0.00001 — 0.00001 72007-68-2 — PFNA — 0.00001 — 0.00001 45285-51-6 — PFOA — 0.0000040 — Not applicable 45298-90-6 — PFOS — 0.0000040 — Not applicable [1]The PFAS Mixture Hazard Index (HI) is the sum of component hazard quotients (HQs), which are calculated by dividing the measured component PFAS concentration in water by the relevant health-based water concentration when expressed in the same units (shown in ng/l for simplification). The HBWC for PFHxS is 10 ng/l; the HBWC for HFPO-DA is 10 ng/l; the HBWC for PFNA is 10 ng/l; and the HBWC for PFBS is 2000 ng/l. Hazard Index = ([HFPO-DAwater ng/l]/[10 ng/l]) + ([PFBSwater ng/l]/[2000 ng/l]) + ([PFNAwater ng/l]/[10 ng/l]) + ([PFHxSwater ng/l]/[10 ng/l]) HBWC = health-based water concentration HQ = hazard quotient ng/l = nanograms per liter PFASwater = the concentration of a specific PFAS in water	The federal rule adds a zero before the decimal point. For clarity, consider inserting a leading zero for all decimal numbers – e.g., the MCL of HFPO-DA should be expressed as 0.00001 mg/L. **10/5/26: The Board addressed the EPA concern.**
The Administrator, pursuant to section 1412 of the Act, hereby identifies in table 3 to this paragraph (d) the best technology, treatment technique, or other means available for achieving compliance with the maximum contaminant levels for all regulated PFAS identified in paragraph (c) of this section: ***Table 3 to Paragraph (d)—Best Available Technologies for PFAS Listed in Paragraph (c) of This Section*** **Contaminant / BAT** Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA) — Anion exchange, GAC, reverse osmosis, nanofiltration. HFPO-DA — Anion exchange, GAC, reverse osmosis, nanofiltration.	40 CFR § 141.61(d)[h]	**35 Ill. Adm. Code 611.311(d)** USEPA, under section 1415(a)(1)(A) of SDWA~~1412 of SDWA~~ identifies in Table 1 to subsection (d) the BAT, treatment technique, or other means available for achieving compliance with the maximum contaminant levels for all regulated PFAS identified in subsection (c). Table 1 to Subsection (d) BAT for PFAS Listed in Subsection (c)(2) **CAS Number / Contaminant / BAT** Not applicable — Hazard Index PFAS — GAC, HPAE, RO, NF 122499-17-6 — HFPO-DA — GAC, HPAE, RO, NF 108427-53-8 — PFHxS — GAC, HPAE, RO, NF	In Sections 611.311(d) and (e), the references to section 1412 of the Safe Drinking Water Act should be revised to Section 1415(a)(1)(A), consistent with the federal provision. **10/5/26: The Board addressed the EPA concern.**

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

PFHxS	Anion exchange, GAC, reverse osmosis, nanofiltration.		
PFNA	Anion exchange, GAC, reverse osmosis, nanofiltration.		
PFOA	Anion exchange, GAC, reverse osmosis, nanofiltration.		
PFOS	Anion exchange, GAC, reverse osmosis, nanofiltration.		

[h] *Note: The table number originally assigned to this new table on April 26, 2024, was amended on June 11, 2024 (see 89 FR 49101).*

72007-68-2	PFNA	GAC, HPAE, RO, NF	
45285-51-6	PFOA	GAC, HPAE, RO, NF	
45298-90-6	PFOS	GAC, HPAE, RO, NF	

EPA Citation 35 Ill. Adm. Code 611.311(d)
Table 1 to Subsection (d) BAT for PFAS Listed in Subsection (c)(2)
Abbreviations (BAT)
GAC Granular Activated Carbon
HPAE Anion Exchange
NF Nanofiltration
PTA Packed Tower Aeration
RO Reverse Osmosis

The Administrator, pursuant to section 1412 of the Act, hereby identifies in table 4 to this paragraph (e) the affordable technology, treatment technique, or other means available to systems serving 10,000 persons or fewer for achieving compliance with the maximum contaminant levels for all regulated PFAS identified in paragraph (c) of this section:

Table 4 to Paragraph (e)—Small System Compliance Technologies (SSCTs) for PFAS

Small System Compliance Technology[1]	**Affordable for Listed Small System Categories**[2]
Granular Activated Carbon	All size categories.
Anion Exchange	All size categories.
Reverse Osmosis, Nanofiltration[3]	3,301 – 10,000.

1. Section 1412(b)(4)(E)(ii) of SDWA specifies that SSCTs must be affordable and technically feasible for small systems.
2. The Act (ibid.) specifies three categories of small systems: (i) those serving 25 or more, but fewer than 501, (ii) those serving more than 500, but fewer than 3,301, and (iii) those serving more than 3,300, but fewer than 10,001.
3. Technologies reject a large volume of water and may not be appropriate for areas where water quantity may be an issue.

[g] *Note: The table number originally assigned to this new table on April 26, 2024, was amended on June 11, 2024 (see 89 FR 49101).*

40 CFR § 141.61(e)

35 Ill. Adm. Code 611.311(e)
USEPA, under section 1415(a)(1)(A) of SDWA~~1412 of SDWA~~, identifies in Table 1 to subsection (e) the affordable technology, treatment technique, or other means available to suppliers serving 10,000 persons or fewer for achieving compliance with the MCLs for all regulated PFAS identified in subsection (c)(2)
Section 611.311(e) List of SSCTs for PFAS

Small System Compliance Technology[1]	**Affordable for Listed Small System Categories**[2]
Granular Activated Carbon	All size categories.
Anion Exchange	All size categories.
Reverse Osmosis[3], Nanofiltration[3]	3,301 – 10,000.

[1]Section 1412(b)(4)(E)(ii) of SDWA specifies that small system compliance technologies (SSCTs) must be affordable and technically feasible for small systems.
[2]SDWA specifies three categories of small systems: (i) those serving 25 or more, but fewer than 501, (ii) those serving more than 500, but fewer than 3,301, and (iii) those serving more than 3,300, but fewer than 10,001.
[3]Technology rejects a large volume of water and may not be appropriate for areas where water quantity may be an issue.

In Sections 611.311(d) and (e), the references to section 1412 of the Safe Drinking Water Act should be revised to Section 1415(a)(1)(A), consistent with the federal provision.

10/5/26: The Board addressed the EPA concern.

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

Appendix A to Subpart O of Part 141—Regulated Contaminants

Contaminant (units)	Traditional MCL in mg/L	To convert for CCR, multiply by	MCL in CCR units	MCLG	Major sources in drinking water	Health effects language
*****						
Synthetic organic contaminants including pesticides and herbicides: * * * * *	*	*	*	*	*	*
Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA) (unitless)	1 (unitless)		1	1	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Per- and polyfluoroalkyl substances (PFAS) can persist in the human body and exposure may lead to increased risk of adverse health effects. Low levels of multiple PFAS that individually would not likely result in increased risk of adverse health effects may result in adverse health effects when combined in a mixture. Some people who consume drinking water containing mixtures of PFAS in excess of the Hazard Index (HI) MCL may have increased health risks such as liver, immune, and thyroid effects following exposure over many years and developmental and thyroid effects following repeated exposure during pregnancy and/or childhood.
*****						
HFPO-DA (ng/l)	0.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain	Some people who drink water containing HFPODA in excess of the MCL over many years may have increased health risks such as immune, liver, and kidney effects. There is also a potential concern for cancer associated with HFPO-DA exposure. In addition, there may be increased risks of

35 Ill. Adm. Code 611. APPENDIX A

Synthetic Organic Contaminants, Including Pesticides and Herbicides

Contaminant (units)	Traditional MCL in mg/L	To convert for CCR, multiply by	MCL in CCR units	MCLG	Major sources in drinking water	Health effects language
Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA) (unitless)	1 (unitless)		1	1	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Per- and polyfluoroalkyl substances (PFAS) can persist in the human body and exposure may lead to increased risk of adverse health effects. Low levels of multiple PFAS that individually would not likely result in increased risk of adverse health effects may result in adverse health effects when combined in a mixture. Some people who consume drinking water containing mixtures of PFAS in excess of the Hazard Index (HI) MCL may have increased health risks such as liver, immune, and thyroid effects following exposure over many years and developmental and thyroid effects following repeated exposure during pregnancy and/or childhood.
HFPO-DA (mg/l)	.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing HFPODA in excess of the MCL over many years may have increased health risks such as immune, liver, and kidney effects. There is also a potential concern for cancer associated with HFPO-DA exposure. In addition, there may be increased risks of developmental effects for people who drink water containing HFPODA in excess of the MCL following repeated exposure during pregnancy and/or childhood.
PFHxS (mg/l)	.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use	Some people who drink water containing PFHxS in excess of the MCL over many years may have increased health risks such as immune, thyroid, and liver effects. In addition,

EPA Comment:
Equivalent (identical)

Illinois reports the MCL for PFOS in CCR units as 4. USEPA reports it as 4.0. The state provision is equivalent in that the IL regulation in Appendix A lists the traditional MCL in mg/L as 4.0 for PFOS, and provides the correct conversion rate, so that the calculation would be correct. See also 35 Ill. Adm. Code 611.311(c)(2), which is the root regulatory provision that lists the MCL for PFOS at 4.0). While the conversion rate is listed correctly, and this is an outlier in the Appendix, EPA requests that the state revise 4 to read 4.0 ASAP, but the substantive effect will not render this less stringent than due to the main regulatory provision regarding MCLs and the calculation rate.

10/5/26: The Board addressed the initial EPA concern.

Typographical error: In the first column named 'Contaminant (units)', the PFAS contaminant units in the federal rule are ng/L but in the state rule they're mg/L. The units in this specific column titled "Contaminant (units)" need to be corrected to be: HFPO-DA (ng/L), PFHxS (ng/L), PFNA (ng/L), PFOA (ng/L), & PFOS (ng/L).

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					firefighting activities	developmental effects for people who drink water containing HFPODA in excess of the MCL following repeated exposure during pregnancy and/or childhood.							of certain consumer products, occupational exposures, and certain firefighting activities	there may be increased risks of developmental effects for people who drink water containing PFHxS in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
*****															
PFHxS (ng/l)	0.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing PFHxS in excess of the MCL over many years may have increased health risks such as immune, thyroid, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFHxS in excess of the MCL following repeated exposure during pregnancy and/or childhood.	PFNA (mg/l)	.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing PFNA in excess of the MCL over many years may have increased health risks such as elevated cholesterol levels, immune effects, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFNA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
PFNA (ng/l)	0.00001	1,000,000	10	10	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing PFNA in excess of the MCL over many years may have increased health risks such as elevated cholesterol levels, immune effects, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFNA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	PFOA Perfluorooctanoate (mg/l)	0.0000040	1,000,000	4.0	0	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing PFOA in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including kidney and testicular cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
PFOA (ng/l)	0.0000040	1,000,000	4.0	0	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	Some people who drink water containing PFOA in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including kidney and testicular cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOA in excess of the MCL following	PFOS (mg/l)	.0000040	1,000,000	4.0	0	Discharge from manufacturing and industrial chemical facilities, use of certain	Some people who drink water containing PFOA in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of	

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PFOS (ng/l)	0.0000040	1,000,000	4.0	0	Discharge from manufacturing and industrial chemical facilities, use of certain consumer products, occupational exposures, and certain firefighting activities	repeated exposure during pregnancy and/or childhood. Some people who drink water containing PFOS in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including liver cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOS in excess of the MCL following repeated exposure during pregnancy and/or childhood.			consumer products, occupational exposures, and certain firefighting activities.	certain types of cancers including kidney and testicular cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	

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Appendix B to Subpart Q of Part 141—Standard Health Effects Language for Public Notification				35 Ill. Adm. Code 611. APPENDIX H Standard Health Effects Language for Public Notification				EPA Comment:
Contaminant	**MCLG[1] mg/L**	**MCL[2] mg/L**	**Standard health effects language for public notification**	**Contaminant**	**MCLG[1] mg/L**	**MCL[2] mg/L**	**Standard health effects language for public notification**	Equivalent (Substantively identical)
* * * * *				* * * * *				Appendix H to 35 Ill. Adm. Code 611 listed the perfluorooctanoic acid ("PFOA") and PFOS MCLs as ".000004." The corresponding federal MCLs are expressed as "0.0000040." The omission of the trailing zero may create ambiguity regarding the intended precision of the values and may affect rounding or reporting. Revising the values to "0.0000040" would also add the leading zero and conform the Board's rule to the format of the corresponding federal MCLs. **10/5/26: The Board addressed the EPA concern**.
E. Synthetic Organic Chemicals (SOCs)				F. Volatile Organic Chemicals (VOCs)				
* * * * *				* * * * *				
55. Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA)	1 (unitless)	1 (unitless)	Per- and polyfluoroalkyl substances (PFAS) can persist in the human body and exposure may lead to increased risk of adverse health effects. Low levels of multiple PFAS that individually would not likely result in increased risk of adverse health effects may result in adverse health effects when combined in a mixture. Some people who consume drinking water containing mixtures of PFAS in excess of the Hazard Index (HI) MCL may have increased health risks such as liver, immune, and thyroid effects following exposure over many years and developmental and thyroid effects following repeated exposure during pregnancy and/or childhood.	55. Hazard Index PFAS (HFPO-DA, PFBS, PFHxS, and PFNA)	1 (unitless)	1 (unitless)	Per- and polyfluoroalkyl substances (PFAS) can persist in the human body and exposure may lead to increased risk of adverse health effects. Low levels of multiple PFAS that individually would not likely result in increased risk of adverse health effects may result in adverse health effects when combined in a mixture. Some people who consume drinking water containing mixtures of PFAS in excess of the Hazard Index (HI) MCL may have increased health risks such as liver, immune, and thyroid effects following exposure over many years and developmental and thyroid effects following repeated exposure during pregnancy and/or childhood.	
56. HFPO-DA	0.00001	0.00001	Some people who drink water containing HFPO-DA in excess of the MCL over many years may have increased health risks such as immune, liver, and kidney effects. There is also a potential concern for cancer associated with HFPO-DA exposure. In addition, there may be increased risks of developmental effects for people who drink water containing HFPO-DA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	56. HFPO-DA	0.00001	0.00001	Some people who drink water containing HFPO-DA in excess of the MCL over many years may have increased health risks such as immune, liver, and kidney effects. There is also a potential concern for cancer associated with HFPO-DA exposure. In addition, there may be increased risks of developmental effects for people who drink water containing HFPO-DA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
57. PFHxS	0.00001	0.00001	Some people who drink water containing PFHxS in excess of the MCL over many years may have increased	57. PFHxS	0.00001	0.00001	Some people who drink water containing PFHxS in excess of the MCL over many years may have increased health risks such as immune, thyroid, and liver effects. In addition, there may be increased risks of	

This is a preliminary technical review of proposed language in the rulemaking under Illinois Pollution Control Board docket number R2025-01(A). The EPA reserves the right to further review and comment, and this table is not to be construed as complete or determinative of any primacy request by the State of Illinois.

			health risks such as immune, thyroid, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFHxS in excess of the MCL following repeated exposure during pregnancy and/or childhood.			developmental effects for people who drink water containing PFHxS in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
58. PFNA	0.00001	0.00001	Some people who drink water containing PFNA in excess of the MCL over many years may have increased health risks such as elevated cholesterol levels, immune effects, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFNA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	58. PFNA	0.00001	0.00001 Some people who drink water containing PFNA in excess of the MCL over many years may have increased health risks such as elevated cholesterol levels, immune effects, and liver effects. In addition, there may be increased risks of developmental effects for people who drink water containing PFNA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
59. PFOA	Zero	0.0000040	Some people who drink water containing PFOA in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including kidney and testicular cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	59. PFOA	Zero	0.00000400~~.00004~~ Some people who drink water containing PFOA in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including kidney and testicular cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOA in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
60. PFOS	Zero	0.0000040	Some people who drink water containing PFOS in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including liver cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOS in excess of the MCL following repeated exposure during pregnancy and/or childhood.	60. PFOS	Zero	0.0000040 Some people who drink water containing PFOS in excess of the MCL over many years may have increased health risks such as cardiovascular, immune, and liver effects, as well as increased incidence of certain types of cancers including liver cancer. In addition, there may be increased risks of developmental and immune effects for people who drink water containing PFOS in excess of the MCL following repeated exposure during pregnancy and/or childhood.	
				* * * * *			
				Appendix H—Endnotes			
				1. “MCLG” means maximum contaminant level goal.			

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* * * * * 1. MCLG–Maximum contaminant level goal. 2. MCL–Maximum contaminant level.	2. “MCL” means maximum contaminant level.	

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