

Shekter, Jean (DEQ)

From: Crooks, Jennifer <crooks.jennifer@epa.gov>
Sent: Tuesday, February 17, 2015 12:45 PM
To: Shekter, Jean (DEQ)
Cc: Carlson, Deborah; Kuefler, Janet; Poy, Thomas; Benzie, Richard (DEQ)
Subject: Region 5 Final Comments on MI draft RTCR for Public Hearing
Attachments: Comments final on Michigan draft RTCR Feb 2015.docx

Hi, Jean. Please see the attached comments on the Michigan draft RTCR. This list of comments includes my comments from Ground Water and Drinking Water Branch, and comments from Office of Regional Counsel. Please let me know if you have any questions.

It's been great working with you, Jean, as usual!

Jennifer

Final Comments on Michigan draft RTCR – February 18, 2015

Fed'l Cite	State Cite	Comment
141.2	108(c)	The draft rules use the term “seasonal supply” instead of “seasonal system”, as noted in #29 of “Notes for Crosswalks”. This is acceptable because the state consistently uses “supply” when referring to the regulated entity. However, the State rule defines “seasonal supply” using the terms “noncommunity water system” and “public water system.” Did you intend to use terms “noncommunity water supply” and “public water supply?”, page 7 of draft rule
141.74(c)(3)(i)	720(4)	Reference to “709d to 709h” should read “704d to 704h”, page 113 of draft rule
		Also, why did the State leave out the phrase, “...as specified in paragraph (a)(1) of this section”...
141.132(c)(1)(i)	719e(3)(a)	Reference to “709d to 709h” should read “704d to 704h”, page 104 of draft rule
141.153(h)(7)(iv)	413(12)(g)(iv)	Reference to “paragraph (d)(4)” should read “paragraph (8)(d)”. See page 63 of draft rule.
141.203(b)(2)	(403)(2)(b)	In the 3 rd sentence, “MCL” is supposed to match up with “total coliform provisions under R 325.10602”. Rule 602 just gives MCLs; where the Federal rule references the Total Coliform Rule. Should the State cite be Rules 705 to 709 for Total Coliform Rule? See page 27 of draft rule.
141.153(h)(7)(i)(A)	413(12)(g)(i)(A)	On page 32 of draft rule in Table 1, Health Effects Language for Total coliform bacteria beginning April 1, 2016, the State says, “Use language in R 325.10413(12)(g)(i)(A)”. Why doesn’t the State just insert the language here, as is done with other entries in Table 1?
Appendix B to Subpart Q	Table 1	The following lines of Table 1 are missing from the draft rule: 1.e. Subpart Y Coliform Assessment and/or Corrective Action Violations, beginning April 1, 2016; 1.f. Subpart Y E.coli Assessment and/or Corrective Action Violations, beginning April 1, 2016; 1.h. Subpart Y Seasonal System TT Violations, beginning April 1, 2016.
Appendix B to Subpart Q	Table 1	On page 33 of the draft State rule; E.coli, beginning April 1, 2016; third line add “all required” after “take” and before “repeat”.
141.853(a)(6)	704c(1)(f)	Second line, “paragraphs” should be “paragraph”. Page 77 of State draft rule.
		Reference in second line, “(a)(5)(i)” should be (iii). Page 77 of State draft rule.