



northeastern illinois planning commission

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DEC 10 2004

STATE OF ILLINOIS
Pollution Control Board

*204-26
PC#9*

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At Large Member
- Jerry Butler
Past President
- Ronald L. Thomas AICP
Executive Director

November 29, 2004

Illinois Pollution Control Board
600 S. Second Street, Suite 402
Springfield, IL 62704

Re: Support of Proposed Phosphorus Regulations

COMMISSIONERS

Appointed by the Governor of Illinois

- Joseph F. Ligos
- Edward W. Paesel
- Appointment Pending
- Appointment Pending
- Appointment Pending
- Appointed by the Mayor of Chicago
- John A. Papp, Alderman
7th Ward, Chicago
- Ed H. Smith, Alderman
28th Ward, Chicago
- Mary Ann Smith, Alderman
48th Ward, Chicago

Dear Sir/Madam:

As Executive Director of The Northeastern Illinois Planning Commission I am submitting the following in support of the proposed phosphorus regulations.

Department of Transportation, Chicago

Wita R. Althos
Director of Regional Programs, Chicago
Elected by the Assembly of Mayors

Thomas G. Aurora, Mayor
Village of Great Oaks

Alan L. Bennett, Trustee
Village of Elmwood Park

Kevin M. Bruske, President
Village of Richmond

Al Latsch, President
Village of Schaumburg

Mark Ruby, Mayor
Village of North Aurora

Rae Rupp Stich, President
Village of Villa Park

Michael K. Smith, Mayor
Village of New Lenox

Edward J. Zabrodzki, Mayor
Village of Tinley Park

Appointed by the County Board

Chairman

Jerry Butler, Member
Cook County Board of Commissioners

Elizabeth Gorman, Member
Cook County Board of Commissioners

Jean P. Murphy, Member
Cook County Board of Commissioners

James O. Hocky, Member
DuPage County Board

Dan Wallé, Member
Kane County Board

Anne Hanigan Bassi, Member
Lake County Board

Ani Gilman, Member
McHenry County Board

James Blotts, Member
Will County Board

Appointed by the Board of the

Regional Transportation Authority

Fred T. L. Norris

Appointed by the Board of the

Chicago Transit Authority

Appointment Pending

Appointed by the Board of Merit

Carol R. Daff

Appointed by the Board of Pace

Richard A. Kwiatkowski

Appointed by the Board of the

Metropolitan Water Reclamation

District of Greater Chicago

Patricia Young

Appointed by the Board of the

Illinois Association of

Park Districts

Judy Beck

Appointed by the Board of the

Chicago Park District

Gerard Sullivan

Appointed by the Board of the

Illinois Association of

Wardens

Based in a thorough review by NIPC's Environment and Natural Resources Department and NIPC's adopted policies, I wish to express full support for the IEPA's proposal for an interim monthly average phosphorus effluent limit of 1 mg/L for many new or increased discharges. Not only is it good for water quality, but it is consistent with and required under current laws and regulations.

As you are aware, the Clean Water Act and Illinois law require that NPDES permits control pollutants that may cause or contribute to violations of water quality standards. It also prohibits allowing new pollution that has not been shown to be necessary. Therefore, limits on the discharge of phosphorus are needed to prevent violations of Illinois water quality standards and comply with antidegradation requirements. The Commission also feels that controls are needed to prevent violations of the water quality standards regarding offensive conditions, pH and dissolved oxygen.

As the Agency's proposal is limited to new or increased discharges, such discharges are already subject to antidegradation regulations. Under the antidegradation regulations, lowering of water quality should only be allowed if it can be demonstrated through a consideration of alternatives and economic analysis that it is necessary to accommodate important economic or social development.

This proposal is good for water quality, and is achievable, as demonstrated by the longstanding and successful phosphorus limit of 1 mg/L established in the 1970's for any discharges to streams that flow to the Great Lakes.

I urge the Pollution Control Board to adopt the IEPA's proposed interim discharge standard for phosphorus of 1 mg/L.

Sincerely,



Ronald Thomas, AICP
Executive Director

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TO: Name/Title: <u>Tel. Pollution</u> Organization: <u>Control Board</u> Fax #: () <u>217 524 8508</u> Phone #: () _____	FROM: Name/Title: <u>Ron Thomas</u> Fax #: (312) 454-0411 Phone #: (312) 454-0400
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Remarks: Support letter for

Proposed Phosphorus Regulations