



Naperville

RECEIVED

CLERK'S OFFICE

MAR - 7 2002

STATE OF ILLINOIS
Pollution Control Board

March 5, 2002

Illinois Pollution Control Board
Attn: Dorothy Gunn, Clerk re Docket R02-11
James R. Thompson Center
100 W. Randolph Street
Suite 11-500
Chicago, IL 60601

P.e.#14

Ladies and Gentlemen:

The City of Naperville Department of Public Utilities requests that the following comments be considered in support of the proposed amendment to 35 IL Adm. Code 304.120.

It was the original intent of the Illinois Control Board to regulate the carbonaceous BOD, rather than total secondary wastewater treatment process. (This can be confirmed in the Board's records.) Total BOD measures only a small and variable component of nitrogenous oxygen demand. The small portion it does measure, however, interferes with the universal application of the test as a comparative measure of these processes.

In the 1970's the USEPA required that secondary treatment processes be measured in total BOD limits. The interference of nitrogenous oxygen demand has created unresolvable problems with such a use of total BOD. Consequently, in 1984 the USEPA authorized use of CBOD for determination of secondary treatment process efficiency. At that time the IEPA began including CBOD in Illinois NPDES permits and has continued to do so to date. The issue before the Board is not intended to extend relief to discharges in the form of a relaxed discharge standard. Rather, the purpose is to eliminate the ambiguity associated with the existing terminology.

The City of Naperville Department of Public Utilities urges the Board to proceed with this proposed change to clarify this otherwise confusing regulation.

Sincerely,

Allen F. Panek, Assistant Director
Naperville Dept. of Public Utilities

ALP/gr305-02