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STATE OF ILLINOIS
Pollution Control Board



CITIZENS
AGAINST
RUINING the
ENVIRONMENT

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P.O. Box 536
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PC#4

August 10, 2004

Ms. Amy Antonioli
Illinois Pollution Control Board
100 W. Randolph Suite 11-500
Chicago, Il. 60601

Re: Revisions to Radium Water Quality Standards: Proposed New 35 Ill. Adm. Code 302.307 and amendments to 35 Ill. Adm. Code 302.207 and 302.525
R04-021 Rulemaking - Water
Before the Illinois Pollution Control Board

Dear Ms. Antonioli:

Citizens Against Ruining the Environment-C.A.R.E. is located in Will County. We understand as part of the Water rulemaking process before the Illinois Pollution Control Board, a change is being considered which would involve the increase from 1 Pico curie to 5 Pico curie's per liter and apply these standards specifically to surface waters used for public and food processing water supplies.

Last year the spreading of Sludge - biosolids - was brought to our attention. We investigated this issue, and found out that this contaminated sludge has been used on Will County Farmland for over thirty years. We are fertilizing with byproducts of industrial and human sewage.

Environmental Science defines sludge as a "viscous, semisolid mixture of bacteria-and virus-laden organic matter, toxic metals, synthetic organic chemicals & settled solids removed from domestic & industrial waste water at sewage treatment plants."

C.A.R.E. is extremely concerned with the proper treatment of this sludge prior to being applied to land. We believe that sludge farming is only transferring pollutants from the treatment plant to the soil, air and ground water from the disposal site.

Many of us are residents in Lockport. Until last year, the water in our area had dangerously high levels of radium. This originally came to our attention approximately 4 years ago because one of us read the small print on the back of our water bills, and discovered that a few dollars had been collected on each residents monthly water bill that went into a "radium bond fund." The back of the bill also stated that: "...A dose of the 5 pci/L ingested over an extended period of time may result in the development of bone cancer in a very small portion of the population..." This information alone would be alarming to most people, however, further investigation indicated that these outrageously high levels of radium were known of and allowed for over two decades. We also discovered that the verbiage used by the City of Lockport to explain the radium situation was flawed. The recommendation submitted by the IEPA for municipalities with high radium levels stated that: "...At the levels of radium detected the short term risk is minimal and no special precautions need to be taken by the consumer [REDACTED] We have questioned the City as well as the Agency as to what they consider an "extended period of time" to be, but no one has given us any answers.

Back in 1998 an EPA Regulatory Manager was quoted in a Chicago Tribune Article that "...Radium does damage to the cells..." and "...there are molecular similarities to calcium..." Since a portion of the radium ingested remains in the bone, is it safe to consume and bath in this water for 5 years? Ten? The Illinois Pollution Control Board had originally ruled on the clean up of radium over a decade ago. They instructed Lockport to institute certain changes in a "timely manner." Lockport instead pleaded hardship, and proclaimed that they needed an extension on more then one occasion due to the growth in the area, and the capital improvements that they had to implement due to this development.

We would appreciate your comments to the questions below:

- Many pathogens cause diseases that sicken, cripple and kill humans. What type of pre-treatment is in place for viruses, bacteria, protozoa and fungi etc.?
- What type of testing is currently in place for heavy metals prior to land farming?
- Does this sludge contain: dioxin, PCBs such as DDT, nickel, asbestos or lead? What other types of pollutants are in this sludge?
- What process is being utilized for testing areas that have been land farmed for several years? How often are the areas tested?
- Radium is a known carcinogen. Should water quality standards allow a known carcinogen to be discharged into Illinois waterways at advanced levels?
- Has the effect of radium on aquatic/wildlife been established at the revised levels?
- Has anyone presented studies that show radium at these levels to be safe for aquatic or human life?

-We already face the prospect of never being able to consume fish in Illinois due to the mercury dispersed from Coal Fired Power Plants. Do we wish to add radium to the mix?

-Should cost even be considered, when we are talking about protection of life forms?

-Shouldn't the safety and welfare of the Illinois Residents be the main priority?

As there are many unanswered questions re: sludge pollutants and radium standards in water that should be addressed prior to making any recommendations, Citizens Against Ruining the Environment requests that additional investigation into the sludge and radium discharging, and land spreading be completed prior to changing any pico curie limits.

Sincerely,

Directors

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