

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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AUG 23 2004

STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:)
)
REVISIONS TO RADIUM WATER QUALITY) R04-21
STANDARDS: PROPOSED NEW 35 ILL.ADM.) (Rulemaking - Water)
CODE 302.307 and AMENDMENTS TO)
35 ILL. ADM. CODE 302.207 and 302.525)
)

PC#7

NOTICE OF FILING

TO: SEE ATTACHED SERVICE LIST.

PLEASE TAKE NOTICE that on Monday, August 23, 2004, we filed the attached **Metropolitan Water Reclamation District's Comments to Proposed Additions and Revisions to Radium Water Quality Standards** with the Clerk of the Pollution Control Board, a copy of which is herewith served upon you.

METROPOLITAN WATER RECLAMATION
DISTRICT OF GREATER CHICAGO

BY: *Michael G. Rosenberg*
Michael G. Rosenberg, its Attorney

Michael G. Rosenberg/Ronald M. Hill
Metropolitan Water Reclamation
District of Greater Chicago
100 East Erie Street
Chicago, IL 60611
(312) 751-6583

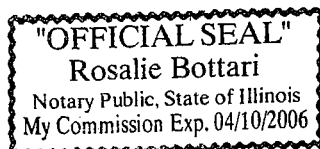
CERTIFICATE OF SERVICE

I, JUDITH PAPPALARDO, being duly sworn on oath, certify that I caused a copy of the attached **Metropolitan Water Reclamation District's Comments to Proposed Additions and Revisions to Radium Water Quality Standards** to be sent via first class U.S. Mail to the individuals identified on the attached service list their addresses as shown, with proper postage prepaid, from 100 E. Erie Street, Chicago, Illinois, at or near the hour of 4:00 p.m., this 23rd day of August, 2004.

Judith Pappalardo

SUBSCRIBED and SWORN to before
me this 23rd day of August, 2004.

Rosalie Bottari
Notary Public



RH:me



Party Name	Role	City & State	Phone/Fax
<u>Metropolitan Water Reclamation District</u> Interested Party	100 East Erie Street	Chicago IL 60611	312/751-6583 312/751-6598
	Richard Lanyon, Director of Research and Development		
<u>IEPA</u> Petitioner	1021 North Grand Avenue East P.O. Box 19276	Springfield IL 62794-9276	217/782-5544 217/782-9807
	Deborah J. Williams ✓ Stefanie N. Diers, Assistant Counsel ✓		
<u>Gardner Carton & Douglas</u> Interested Party	191 N. Wacker Drive Suite 3700	Chicago IL 60606-1698	312/569/1000 312/569-3000
	Roy M. Harsch ✓ Sasha M. Engle ✓		
<u>Sonnenschein Nath & Rosenthal</u> Interested Party	8000 Sears Tower 233 South Wacker Drive	Chicago IL 60606-6404	312/876-8000 312/876-7934
	Jeffrey C. Fort ✓ Letissa Carver Reid ✓		
<u>Office of the Attorney General</u> Petitioner	Environmental Bureau 188 West Randolph, 20th Floor	Chicago IL 60601	312/814-2550 312/814-2347
	Joel J. Sternstein, Assistant Attorney General ✓ Matthew J. Dunn, Division Chief ✓		
<u>Wilkie & McMahon</u> Interested Party	8 East Main Street	Champaign IL 61820	217/359-2115 217/359-2754
	John McMahon		
<u>Illinois Pollution Control Board</u> Interested Party	100 W. Randolph St. Suite 11-500	Chicago IL 60601	3128143956
	Dorothy M. Gunn, Clerk of the Board Amy Antonioli, Hearing Officer		
<u>Illinois Department of Natural Resources</u> Interested Party	One Natural Resources Way	Springfield IL 62702-1271	217/782-1809 217/524-9640
	Jonathan Furr, General Counsel		
<u>CICI</u> Interested Party	2250 E. Devon Ave. Suite 239	Des Plaines IL 60018	847-544-5995
	Lisa Frede		
<u>Total Environmental Solutions</u> Interested Party	631 E. Butterfield Rd. Suite 315	Lombard IL 60148	6309693300 6309693303
	William Seith		
<u>Metropolitan Water Reclamation District of Greater Chicago</u> Interested Party	<i>Stickney Road</i> 6001 W. Pershing Road	Cicero IL 60804	708-588-4071
	Abdul Khaliq, Radiation Chemist		

Total number of participants: 16

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**METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER
CHICAGO'S COMMENTS TO PROPOSED ADDITIONS AND REVISIONS TO
RADIUM WATER QUALITY STANDARDS**

The Metropolitan Water Reclamation District of Greater Chicago ("District"), submits the following comments in support of the proposed addition of 35 Ill. Adm. Code Part 302.307, and amendments to 35 Ill. Adm. Code 302.207 and 302.525.

1. My name is Richard Lanyon. I am the Director of Research and Development for the Metropolitan Water Reclamation District of Greater Chicago. I am submitting the following statement on behalf of the District in support of the proposed additions and amendments to the standard for radium.

2. The District is a unit of local government created by the state legislature for the purpose of collecting and disposing of sewerage, reducing pollution of the waterways and preventing flooding. 70 ILCS 2605/1, *et seq.* ("District Act"). The District's service area is most of Cook County. In its capacity as a water reclamation district, the District operates seven treatment facilities in its service area, serves five million residents and treats an average of 1.4 billion gallons of sewage daily. The District has seven wastewater treatment plant NPDES permits issued by the Illinois Environmental Protection Agency ("IEPA").

3. The District has reviewed the revisions to the Radium Water Quality Standards: Proposed 35 Ill. Adm. Code 302.307 and amendments to 35 Ill. Adm. Code 302.207 and 302.525, and agrees with the Illinois Environmental Protection Agency's ("Agency") proposal as delineated in the Board's First Notice for the following reasons:

A. The only known documented exposure pathway that poses significant risk to human health or the environment for radium-226 is human exposure to drinking water. The Agency conducted a literature survey for radium impacts to aquatic life and found no scientific papers or other information on this subject. United States Environmental Protection Agency-Region V water quality standards staff also found no indication that radium poses risk in pathways other than the human drinking water pathway.

B. The current water quality standard for radium-226 in General Use water (302.207) and the Lake Michigan Basin (302.525) is 1 pCi/L, whereas the federal drinking water maximum contaminant level for radium-226 plus radium-228 is 5 pCi/L. The General Use water and Lake Michigan Basin standards are more stringent than drinking water standards and there is currently no scientific basis for this. Therefore, there is no reason to regulate radium-226 in General Use water or the Lake Michigan Basin at such a low concentration.


C. Because consumption of drinking water is the only pathway currently sufficiently documented to pose significant risk, the Agency is justified in moving the standards

from General Use water quality to the Public and Food Processing water supply. The Agency is also correct in deleting the standard from General Use waters and the Lake Michigan Basin until such time as sufficient information is generated to demonstrate that radium-226 in these waters poses an environmental risk.

D. Adoption of the proposed revisions will relieve point source discharger such as POTWs of an unnecessary burden of being subjected to possible effluent limitations on radium-226. Such limitations would not have any environmental benefit, but could place a financial burden on the POTW community.

In summary, the proposed rule as published in the Illinois Register brings Illinois radium water quality standards in line with federal radium drinking water standards and relieves the POTW community from unnecessary regulatory burdens.

Metropolitan Water Reclamation District
of Greater Chicago,

By: 
Richard Lanyon, Director of R&D

August 23, 2004

Metropolitan Water Reclamation
District of Greater Chicago
100 East Erie
Chicago, Illinois 60611
312.751.5190

THIS FILING IS SUBMITTED ON RECYCLED PAPER