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STATE OF ILLINOIS
Pollution Control Board
October 5, 2004

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Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

In re: R04-21

Dear Ms. Gunn:

Openlands Project is a 40-year old non-profit organization dedicated to preserving and enhancing public open space in northeastern Illinois. Openlands Project appreciates the opportunity to comment on IEPA's proposal to revise the Radium Water Quality Standards to increase the allowable amount of radium from one picocurie per liter to five picocuries per liter.

Openlands is concerned about this proposed rule change. Specifically, we urge the Board not to adopt the proposal until more information is available about the possible harmful effects of such a change on aquatic life and drinking water supplies. We understand that information may soon be available on the possible effect on certain species. We therefore ask the Board to investigate this information thoroughly before making any changes to the rule.

Openlands also believes that, as a general principle, the Board should not relax water quality standards in the absence of clear and convincing evidence that the changes will not harm any aquatic life or drinking water supplies. We believe that the species most sensitive to a particular pollutant should be identified for any proposed rule change and that no rule change should be allowed that would harm those species.

Sincerely,

Richard Acker
Regional Land Use Coordinator

PC #8