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STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
REVISIONS TO RADIUM QUALITY)	R 04-21
STANDARDS: PROPOSED NEW 35 ILL. ADM)	(Rulemaking -Water)
CODE 302.307 and AMENDMENTS TO)	
35 ILL. ADM. CODE 302.207 and 302.525)	

NOTICE

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

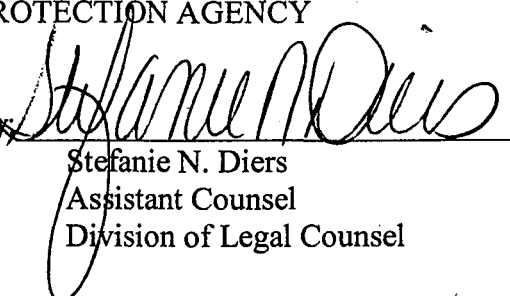
SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have filed with the Office of the Pollution Control Board the AGENCY'S RESPONSE TO DOCUMENTS REQUESTED AT THE FOURTH HEARING on behalf of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Date: November 23, 2004

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By



Stefanie N. Diers
Assistant Counsel
Division of Legal Counsel

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Spring field, IL 62794-9276
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NOV 29 2004

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

REVISIONS TO RADIUM WATER)
QUALITY STANDARDS: PROPOSED)
NEW 35 ILL.ADM.CODE 302.307) R04-021
AND AMENDMENTS TO 35 ILL.ADM.) Rulemaking – Water
CODE 302.207 AND 302.525)

STATE OF ILLINOIS
Pollution Control Board

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO
DOCUMENTS REQUESTED AT THE FOURTH HEARING**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), by and through one of its attorneys, Stefanie N. Diers, and hereby respectfully submits to the Illinois Pollution Control Board ("Board") the documents requested or offered to be submitted by the Illinois EPA at the October 21 and 22, 2004 public hearing in the above captioned docket. A summary of the documents submitted follows:

ATTACHMENT A: Sign-in sheet from March 12, 2003 stakeholder meeting on Radium Water Quality Standards proposal.

ATTACHMENT B: Lists of generators of radium containing sludge. Three tables are provided in Attachment B regarding Publicly Owned Treatment Works that have permits to land apply sludge with tributary drinking water supplies that have violated the Maximum Contaminant Level ("MCL") for radium 226 and 228 combined. The first table lists the generators and their land application permit numbers. The second table lists the levels of radium (in picoCuries per gram) for those generators that have responded to the Agency's request for information. The third table provides a list of receiving streams for each generator's POTW discharge.

ATTACHMENT C: Table providing list of radium water quality standards in other States that were researched before and during this proceeding.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: 

Stefanie N. Diers
Assistant Counsel
Division of Legal Counsel

November 23, 2004

1021 N. Grand Ave. E
P.O. Box 19276
Springfield, Illinois 62794-9276

ATTACHMENT A

ATTACHMENT B

Permitted Facilities With Radium Source Water

<i>Facility Name</i>	<i>State Permit Number</i>
Alexis	2002-SC-1812
Bartlett	2001-SC-4121
Bensenville	2000-SC-1163
Bloomington	1999-SC-4111
Braidwood	2003-SC-4965
Cary	2000-SC-0364
Channahon*	2000-SC-1151
Chillicothe SD	2001-SC-3896
Cuba	2002-SC-1660
DeKalb SD	2002-SC-0508
DePue	1999-SC-4417
Dixon	2002-SC-0484
Elmhurst	2001-SC-2929
Fox Lake	2002-SC-0997
Fox Metro WRD	2001-SC-3020
Fulton	2004-SC-5493
Galena	1999-SC-3056
Geneva*	2002-SC-1376
Genoa	2002-SC-5038
Hanna City SD	2002-SC-1323
Hanover Park	2003-SC-2492
Hinckley	2003-SC-3511
Huntley East*	2003-SC-3365
Huntley West*	2003-SC-3365
Joliet East*	2001-SC-2708
Joliet West*	2001-SC-2708
Kewanee	2002-SC-0657

Monday, November 22, 2004

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**Facility contacted by Illinois EPA*

<i>Facility Name</i>	<i>State Permit Number</i>
Knoxville	1997-SC-5112
Lake Co.-Des Plaines	2000-SC-5387
Lake Co.-Mill Creek	2000-SC-5387
Lake Co.-New Century	2000-SC-5387
Lake In The Hills SD*	1999-SC-3964
Lockport	2000-SC-0026
Marseilles	2000-SC-1566
Mendota	2002-SC-1779
Minonk	2003-SC-4679
Minooka	2003-SC-5331
Monmouth Main	2000-SC-1883
Monmouth North	2000-SC-1883
Mooseheart Child City	2004-SC-5383
Morris	2003-SC-5410
Mount Carroll	2001-SC-5146
Mundelein	2001-SC-4199
Ottawa	1999-SC-4578
Plainfield	2000-SC-0243
Romeoville	2000-SC-2511
Roselle Botterman	2001-SC-2950
Roselle Devlin STP	2001-SC-2950
Sandwich	2000-SC-1022
Seneca	2001-SC-4538
South Beloit	1999-SC-5273
St. Charles	1999-SC-5058
Sycamore North	2000-SC-2341
Toluca	1999-SC-3163
Toulon	2002-SC-0658
Wauconda	2003-SC-4611

<i>Facility Name</i>	<i>State Permit Number</i>
Wilmington	2000-SC-2094
Wyoming	2002-SC-0084
Yates City	2002-SC-1710

Radium Concentrations In Sludge

all concentrations are in pCi/g

<i>Generator</i>	<i>Radium 226</i>	<i>Radium 228</i>	<i>Total Radium</i>
Alexis			
Bartlett	1.7	2.5	4.2
Bensenville			
Bloomington			
Braidwood			
Cary			
Channahon*	21	11	32
Chillicothe SD			
Cuba			
DeKalb SD	13.5	13.7	27.2
DePue			
Dixon			
Elmhurst			
Fox Lake	1.2	1.8	3
Fox Metro WRD			
Fulton	7.9	3.5	11.4
Galena	5.2	2.7	7.9
Geneva*	4.9	10.2	15.1
Genoa	4.2	3.2	7.4
Hanna City SD			
Hanover Park	0.6	0.7	1.3
Hinckley			
Huntley East*	18.6	17.2	35.8
Huntley West*	23.5	18.8	42.3
Joliet East*	8.8	9.9	18.7
Joliet West*	18.3	28.9	47.2

<i>Generator</i>	<i>Radium 226</i>	<i>Radium 228</i>	<i>Total Radium</i>
Kewanee	21	11.6	31.6
Knoxville	5.2	20	7.2
Lake Co.-Des Plaines	4.4	6.4	10.8
Lake Co.-Mill Creek	6	7.7	13.7
Lake Co.-New Century	1	1.2	2.2
Lake In The Hills SD*	4.5	8.2	12.7
Lockport			0
Marseilles	1.7	2.7	4.4
Mendota			
Minonk			
Minooka			
Monmouth Main	10	6.3	16.3
Monmouth North	5	2.9	7.9
Mooseheart Child City			
Morris			
Mount Carroll			
Mundelein	1	1	2
Ottawa	5.6	4	9.6
Plainfield			
Romeoville	11.2	7.6	18.8
Roselle Botterman	0	0	0
Roselle Devlin STP			
Sandwich	6.3	3.9	10.2
Seneca	12.7	9.3	22
South Beloit	1.6	3.6	5.2
St. Charles	2.7	4.8	7.5
Sycamore North			
Toluca			
Toulon			0

<i>Generator</i>	<i>Radium 226</i>	<i>Radium 228</i>	<i>Total Radium</i>
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Wauconda

Wilmington

Wyoming

Yates City

28

5.1

33.1

Streams Receiving Effluent Containing Radium

<i>Generator</i>	<i>NPDES Permit</i>	<i>Receiving Stream</i>
Alexis	IL0021211	Unnamed Tributary of Middle Henderson Creek
Bartlett	IL0027618	West Branch DuPage River
Bensenville	IL0021849	Addison Creek
Bloomingtondale	IL0021130	East Branch DuPage River
Braidwood	IL0054992	Unnamed tributary to Claypool Ditch
Cary	IL0020516	Fox River
Channahon*	IL0069906	Backwater area of the Des Plaines River
Chillicothe SD	IL23159	Illinois River
Cuba	IL0020311	Unnamed tributary of Big Creek
DeKalb SD	IL0023027	South Branch Kishwaukee River
DePue	IL0023523	Lake DePue
Dixon	IL0026450	Rock River
Elmhurst	IL0028746	Salt Creek
Fox Lake	IL0020958	Fox River
Fox Metro WRD	IL0020818	Fox River
Fulton	IL0028860	Mississippi River
Galena	IL0020249	Galena River

*Generator**NPDES Permit Receiving Stream*

Geneva*	IL0020087	Fox River
Genoa	IL0055182	South Branch Kishwaukee River
Hanna City SD	IL0029106	Johnson Run Tributary to Kickapoo Creek
Hanover Park	IL0034479	West Branch DuPage River
Hinckley	IL0050628	Little Rock Creek
Huntley East*	IL0029238	Huntley Branch to South Branch Kishwaukee River
Huntley West*	IL0070688	South Branch Kishwaukee River
Joliet East*	IL0022519	Hickory Creek at Confluence with Des Plaines River
Joliet West*	IL0033553	Des Plaines River
Kewanee	IL0029343	West Fork Spoon River
Knoxville	IL0022209	Unnamed Tributary to Haw Creek
Lake Co.-Des Plaines	IL0022055	Aptakistic Creek tributary to Des Plaines River
Lake Co.-Mill Creek	IL0020478	Des Plaines River
Lake Co.-New Century	IL0022071	Des Plaines River
Lake In The Hills SD*	IL0021733	Crystal Creek
Lockport	IL0029611	Deep Run Creek
Marseilles	IL0021059	Illinois River
Mendota	IL0023221	Mendota Creek
Minonk	IL0037818	Long Point Creek tributary to Vermilion River
Minooka	IL0055913	DuPage River

<i>Generator</i>	<i>NPDES Permit</i>	<i>Receiving Stream</i>
Monmouth Main	IL0021253	Unnamed Tributary of Markham Creek
Monmouth North	IL0036218	Unnamed Tributary of Markham Creek
Mooseheart Child City	IL0027260	Fox River
Morris	IL0021113	Illinois River
Mount Carroll	IL0020176	Carroll Creek
Mundelein	IL0022501	Des Plaines River
Ottawa	IL0030384	Illinois River
Plainfield	IL0024373	DuPage River
Romeoville	IL0030205	Des Plaines River
Roselle Botterman	IL0048721	West Branch DuPage River
Roselle Devlin STP	IL0030813	Springbrook Creek tributary to Salt Creek
Sandwich	IL0030970	Harvey Creek
Seneca	IL0022446	Illinois River
South Beloit	IL0021156	Rock River
St. Charles	IL0022705	Fox River
Sycamore North	IL0031291	East Branch of South Fork Kishwaukee River
Toluca	IL0021695	North Branch Crow Creek
Toulon	IL0025054	Indian Creek
Wauconda	IL0020109	Fiddle Creek
Wilmington	IL0026025	Kankakee River

Generator

NPDES Permit

Receiving Stream

Wyoming

IL0026336

Unnamed tributary to Spoon River

Yates City

IL0020346

Unnamed tributary to French Creek

ATTACHMENT C

Surface Water Quality Standards for Radium

State	pCi/L radium	Point of Applicability	Contact	Comments
Arizona	5	Waters Designated as Domestic Water Supply Use Other waters have no standard	Website	A list of Arizona waters indicates that relatively few water bodies are designated as "Domestic Water Supply" use
California	Narrative	all waters	Bill Reeves CA WQS Unit	No numeric standard. Narrative say "Radionuclides shall not cause impacts to humans, aquatic life or wildlife"
Florida	5	All waters	Nancy Ross FDEP	Rule adopted in 1978 under the theory that if human health is protected, all uses are protected
Illinois	1	All waters except Secondary Contact and Indigenous Aquatic Life Use waters	Bob Mosher IEPA	
Iowa	5	Public Water Supply Intakes Other waters have no standard	Connie Choi Iowa DNR	Identical to IEPA proposed standard
Michigan	No WQS		Sylvia Heaton MDEQ	MI regulations refer to NRC and USEPA standards as applying in surface waters. There are no such standards
Ohio	No WQS		Bob Heitzman OEPA	The water quality standard was removed. Another state agency controls radionuclides
Oklahoma	5	Public Water Supply Intakes Other waters have no standard	Derek Smithee ODNR	Identical to IEPA proposed standard
ORSANCC	4	Public Water Supplies (entire Ohio River)		The entire Ohio River is considered a potential public water supply
Utah	5	Domestic Water Supplies Other waters have no standard	Website	An alpha-emitter standard of 15 pCi/L is present for wildlife protection
Wisconsin	No WQS		Bob Masnado WDNR	No reference to other agency's standard
Colorado	5	All waters	Website	
Missouri	5	All waters	John Ford	
Indiana	3	Public Water Supply Intakes Other waters have no standard	Dennis Clark IDEM	
Minnesota	No WQS		MPCA Website	Like Ohio, the MN water quality standards point toward another state agency as having authority

STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

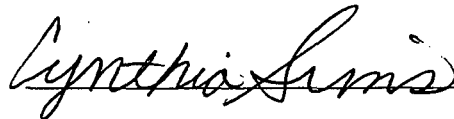
PROOF OF SERVICE

I, the undersigned, on oath state that I have served the attached Agency's Responses to Documents Requested at the Fourth Hearing, upon the person to whom it is directed, by placing it in an envelope addressed to:

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


SEE ATTACHED SERVICE LIST

and mailing it by First Class Mail from Springfield, Illinois on November 23, 2004, with sufficient postage affixed.



SUBSCRIBED AND SWORN TO BEFORE ME

this 23rd day of November, 2004



Notary Public



R 04-21 SERVICE LIST

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