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STATE OF ILLINOIS  
Pollution Control Board**American Bottom Conservancy****614 North 7<sup>th</sup> St., East St. Louis, IL 62201**  
**(618) 875-9960, Fax (618) 271-0835**

December 6, 2004

Illinois Pollution Control Board  
600 S. Second Street, Suite 402  
Springfield, IL 62704

via Fax 312-814-3669

Re: R2004-026 Interim Phosphorus Effluent Standard PC#4

Dear Chairman Novak and Members of the Board:

American Bottom Conservancy (ABC) is a not-for-profit organization working to protect the resources, citizens and communities of the American Bottom floodplain in Southwestern Illinois. ABC is a member of the Illinois Department of Natural Resources Ecosystem Partnership, Conservation Congress and the Clean Water Network. Most of our area waters are impaired—many covered with green algal slime—and are urgently in need of protection.

We strongly support the proposal of Illinois Environmental Protection Agency (IEPA) for an interim monthly average phosphorus effluent limit of 1 mg/L for new or increased discharges. Not only is it good for water quality, but it is also consistent with and required under current laws and regulations.

The Clean Water Act and Illinois law require that NPDES permits control pollutants that may cause or contribute to violations of water quality standards and prohibit allowing new pollution that has not been shown to be necessary. Therefore, limits on the discharge of phosphorus are needed to prevent violations of Illinois water quality standards and comply with antidegradation requirements. In addition, controls are needed to prevent violations of the water quality standards regarding offensive conditions, pH and dissolved oxygen.

The Agency's proposal is limited to new or increased discharges. Such discharges are already subject to antidegradation regulations. Under the antidegradation regulations, lowering of water quality should only be allowed if it can be demonstrated through a consideration of alternatives and economic analysis that it is necessary to accommodate important economic or social development.

Not only is IEPA's proposal good for water quality, it is readily achievable, as demonstrated by the longstanding and successful phosphorus limit of 1 mg/L established in the 1970's for any discharges to streams that flow to the Great Lakes. We urge you to adopt IEPA's proposed interim discharge standard for phosphorus of 1 mg/L. Thank you for your consideration of our comments.

Sincerely,

Kathy Andria  
President