

FROM : Illinois Environmental Council FAX NO. : 217-544-5958

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STATE OF ILLINOIS
Pollution Control Board
Illinois Environmental Council
Illinois Environmental Council Education Fund
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December 9, 2004

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

VIA FAX: 312-814-3669

To Whom It May Concern:

I am writing to express the support of the Illinois Environmental Council for Illinois Environmental Protection Agency's proposal on phosphorus limits for new or increased discharges. IEC is a 29 year old statewide organization representing 50 environmental and conservation organizations in Illinois.

We strongly support an interim monthly average phosphorus effluent limit of 1 mg/l, for new or increased discharges. This proposal is good for water quality, and is consistent with and required under current laws and regulations.

Both 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. Limits on the discharge of phosphorus are therefore needed to prevent violations of Illinois water quality standards and to comply with antidegradation requirements. Also, controls are needed to prevent violations of the water quality standards regarding offensive conditions, pH and dissolved oxygen.

The track record for a similar limit on discharges into the Great Lakes demonstrates that this proposal is effective and achievable. I urge the Pollution Control Board to adopt the IEPA's proposed interim discharge standard for phosphorus of 1 mg/L.

Sincerely Yours,

Jonathan Goldman
Executive Director

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PC#6*