

ILLINOIS SECTION AMERICAN WATER WORKS ASSOCIATION

P.C. # 34

December 14, 2004

Reply to: Illinois Section AWWA
535 Yorkshire Drive
Dekalb, IL 60115

RECEIVED
CLERK'S OFFICE
DEC 15 2004
STATE OF ILLINOIS
Pollution Control Board

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

VIA FAX# 312-814-3669 and USPS

RE: Docket No. R-04-021
Revisions to Radium Water Quality Standards

Dear Ms. Gunn:

The Illinois Water Utility Council was formed by the Illinois Section of the American Water Works Association to evaluate and comment on legislative, regulatory and other matters, which directly affect water utilities. The pending proposal of the Illinois Environmental Protection Agency to modify the water quality standard for radium directly affects water utilities in Illinois.

The proposal of the Illinois Environmental Protection Agency recognizes that radium has been discharged to surface waters for decades. Many of the utilities that are members of the American Waterworks Association have been providing drinking water to their communities for over 100 years. Any water supply using water from the deep aquifer has been discharging radium for that same time period.

The proposal of the Illinois Environmental Protection Agency had been characterized as the de-regulation of radium. This is not true. IEPA has recognized that the allowable concentration in streams and rivers in Illinois is two orders of magnitude greater than the current standard and the highest concentration of radium measured in well water in Illinois. The establishment of a numerical limit that is two orders of magnitude higher than any concentration measured from wells in Illinois would not have any different impact on the waters than the current proposal.

The Water Utility Council is concerned that a specific treatment technique may be required for radium if the current standard is left in place. Water utilities have responsibilities to their customers to select a treatment method that best meets the needs of their system. Funds received from the public will be spent to comply with the established rules and these funds should be spent wisely. The installation of equipment to meet a water quality standard of 1.0 pico curies per liter of radium 226 is unrealistic when the current standard for water delivered to people is 5.0 pico curies per liter of combined radium 226 and radium 228.

Public water supplies provide potable drinking water for human consumption with radium levels up to 5.0 pico curies that is in full compliance with all drinking water regulations. There is no scientific basis to indicate the need for removal of radium levels below 5.0 pico curies from wastewater discharged to the environment. The Illinois Section American Water Works Association supports the IEPA Proposal.

The Illinois Water Utility Council appreciates the opportunity to provide comment on this very important issue to water utilities in Illinois.

Very truly yours,



F. Edward Glatfelter
Chair
ISAWWA Water Utility Council

Executive Director
Central Lake County
Joint Action Water Agency