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STATE OF ILLINOIS
Pollution Control Board



STATE OF ILLINOIS
Office of Lieutenant Governor Pat Quinn

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December 7, 2004

PC#12

Hearing Officer John Knittle
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

RE: In the Matter of Interim Phosphorus Effluent Standard, Case #2004-026

Dear Mr. Hearing Officer:

I write to express my support for the Illinois Environmental Protection Agency's (IEPA) proposed revisions to Subpart A of the State's General Effluent Standards. The proposed revisions present a strong means of improving the public health, environment, and economy of Illinois by reducing the serious problem of phosphorus contamination in our rivers, streams and lakes.

The Illinois EPA has identified excessive nutrient pollution as one of the top causes of water quality impairment in our state. Overabundance of the nutrient phosphorus, in particular, has led to excess algae growth, eutrophication and dissolved oxygen deficiencies. Excess algae makes for green, foul-smelling water that, even when filtered, has become a source of numerous drinking water complaints.

Phosphorus contamination has also contributed to poor habitat for fish and other wildlife throughout the state, decreasing fishing and boating, lowering lakeshore property values and diminishing our water's potential as an economic and recreational resource.

Current state water quality standards limit the phosphorus content to 1 mg/l for all discharges to lakes. Though beneficial in their own right, these standards need extension to all surface waters if we are to effectively preserve the quality of our drinking water and the vitality of our rivers and streams.

The Illinois EPA has proposed interim phosphorus standards that would limit the phosphorus content to 1 mg/l for discharges from new or expanded water treatment works to all general use waters, including rivers, streams and lakes. By setting an interim limit while working on the scientific details to extend phosphorus limits to all waters, Illinois will take a strong step toward improving the public health, environment, and economy.

I would like to commend the Metropolitan Water Reclamation District of Greater Chicago for outlining in this proceeding a number of inventive methods for decreasing phosphorus contamination, including the creation of a water quality trading program that utilizes the nutrient reduction capabilities of wetlands, as well as restrictions on the sale of commercial products that contain high levels of bio-available phosphorus.

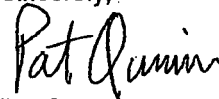
These measures will help establish a framework that encourages entrepreneurial, market-based means of reducing phosphorus pollution, strengthening the state's economy while improving its public health and environment. However, it is important to have such standards to encourage this entrepreneurial approach, yet have the flexibility to allow and encourage measure that provide additional benefits in addition to compliance.

Implementing proposals such as these, in conjunction with IEPA's suggested modifications to existing standards, would give Illinois a diverse, dynamic set of tools with which to reduce phosphorus contamination.

Strict effluent standards alone may not have enough inherent flexibility to effectively manage all significant sources of phosphorus contamination. In turn, a more flexible, entrepreneurial approach may not be truly effective without the backstop of a uniform effluent standard and enforced compliance.

Therefore, I wish to respectfully recommend the adoption of the Illinois Environmental Protection Agency's suggested revisions to current phosphorus standards. In the future, it may be necessary to consider the inclusion of flexible, market-based proposals. Let us take advantage of the diversity of proposals put forth by those with a strong interest in Illinois' water quality to create a flexible, rigorous program for phosphorus reduction that will improve our state's public health, environment, and economy.

Sincerely,



Pat Quinn
Lieutenant Governor