



VILLAGE OF CHANNAHON

24555 S. NAVAJO DRIVE • CHANNAHON, ILLINOIS 60410-3334
(815) 467-6644 • FAX 467-9774 • www.channahon.org

August 12, 2005

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

RECEIVED
CLERK'S OFFICE

AUG 15 2005

STATE OF ILLINOIS
Pollution Control Board

P.C. # 48

RE: Docket R04-21
Revisions to Radium Water Quality Standards: Proposed New 35 Ill. Adm. Code
302.307 and Amendments to 35 Ill. Adm. Code 302.207 and 302.525

Dear Ms. Gunn:

The Village of Channahon would like to submit the following comments in regarding the above proposed rulemaking.

1. USEPA has not developed water quality guidance based on a technical or scientific justification for the 3.75 standard. The Illinois Environmental Protection Agency has proposed a standard of 5.0 pico-curies per liter at water supply and food processing intakes and no numeric standard as a general water quality standard.
2. The Illinois Emergency Management Agency, Division of Nuclear Safety standard for discharge from facilities that they regulate is 60 pico-curies per liter.
3. The standard as proposed does not provide the intended relief to dischargers.
4. No increased discharges will result from the setting of a standard in the range of 30-60.
5. A standard must be developed because the 1.0 pico-curies per liter radium 226 standard cannot be met by dischargers.
6. Water supplies that have already complied with the drinking water standard will now face additional costs to comply with a standard that does not improve the environment. This is a misuse of public funds.
7. Water supplies in the process of complying with the drinking water standard should not face additional costs not borne by others without a commensurate improvement in the environment.
8. It has not been demonstrated that wildlife in Illinois is at risk due to radium discharges.

Again, the Village of Channahon supports the IEPA's proposal to revise the current radium water quality standards.

Sincerely,

Edward S. Dolezal, P.E.
Director of Public Works