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Providing a Better Environment for South Central DuPage County

December 12, 2006

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STATE OF ILLINOIS
Pollution Control Board

Pollution Control Board
Dorothy Gunn, Clerk
JRTC
100 Randolph Street, Suite 11-500
Chicago, Illinois 60601

PC#88

**RE: Proposed Amendments to Dissolved Oxygen Standard
35 ILL. ADM.CODE 302.206
Pollution Control Board Rule R04-25**

Dear Ms. Gunn:

The Downers Grove Sanitary District would like to record its support for the Illinois Association of Wastewater Agency (IAWA), petition R04-25.

We have followed the hearings closely and feel that the evidence supports the position of IAWA as originally filed. The IAWA petition would establish a dissolved oxygen water quality standard that is founded in good science, is protective of Illinois surface waters and biological resources and is attainable. The standard proposed by IAWA would establish a seasonal dissolved oxygen standard that is protective of early life stages of fish, aquatic insects and benthic organisms and establish a minimum concentration, 3.5 mg/L, which is more protective than the USEPA National Criteria Document.

We do not agree with the position supported by the Illinois Department of Natural Resources and the Illinois Environmental Protection Agency. These agencies have not proven the case for their proposed oxygen concentrations in surface waters. The data show that adoption of the agency proposed dissolved oxygen concentrations would continue a water quality standard that is unattainable even in the least disturbed surface water systems. We are especially opposed to the establishment of a different standard for certain river segments without proper evidence to justify such a designation.

Dorothy Gunn
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We encourage the Board to adopt the IAWA petition R04-25 as filed.

Very truly yours,

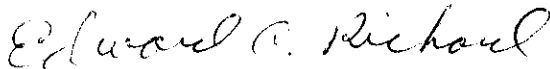
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