



Fox Metro

Water Reclamation District

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Illinois Pollution Control Board
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100 Randolph Street, Suite 11-500
Chicago, Illinois 60601

December 11, 2007

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DEC 14 2006

STATE OF ILLINOIS
Pollution Control Board

PC#89

RE: Illinois Pollution Control Board R04-25 (Rulemaking - Water)
Proposed Amendments to Dissolved Oxygen Standard
35 Ill. Adm. Code 302.206

Dear Ms. Gunn:

The Fox Metro Water Reclamation District (Fox Metro) would like to record its support for the Illinois Association of Wastewater Agency (IAWA) petition designated as R04-25.

Fox Metro representatives have been in attendance at the public hearings and have intently listened to the testimony presented. Fox Metro feels that the evidence presented supports the IAWA petition as originally filed. The petition would establish a dissolved oxygen water quality standard that protects the state's surface waters and indigenous aquatic life.

Fox Metro feels that the data presented as part of IAWA's testimony represents good science which supports the petition and a proposed set of standards which are attainable in minimally disturbed water systems. The IAWA petition proposes to establish a seasonal dissolved oxygen standard that is protective of early live stages of fish, aquatic insects and benthic organisms and establishes a minimum standard that is more stringent than that suggested by USEPA in its National Criteria Document.

Fox Metro has heard and has examined the testimony of the Illinois Department of Natural Resources and the Illinois Environmental Protection Agency. Fox Metro does not believe that these agencies have provided the scientific evidence to support their proposed modifications of the IAWA petition. Data provided during the hearings suggests that the agencies proposed modifications would merely be a continuance of a dissolved oxygen water quality standard that is unattainable, even in minimally disturbed surface water systems.

Fox Metro is strongly opposed to the establishment of river segments that would be subject to an even more stringent standard without the scientific evidence needed to support such a designation. Furthermore, Fox Metro believes that the evidence presented during the hearings showed that river segments, identified in a proposal to modify the IAWA petition, did not need a special dissolved oxygen standard.

Therefore, in consideration of the above reasons, Fox Metro encourages the Board to adopt the IAWA petition R04-25 as filed.

Thank You

Thomas F. Muth, Manager
Fox Metro Water Reclamation District