



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

Re: R 04-25, Proposed Amendments to Dissolved Oxygen Standard 35 Ill. Adm. Code 302.206

Dear Ms. Gunn,

The Chemical Industry Council of Illinois ("CICI") would like to register its voice in support of the amendment to the Board's regulations which is proposed in this proceeding. CICI is a statewide trade association representing the chemical industry in Illinois. CICI has a 196 member companies employing over 54,000 workers in 745 manufacturing facilities and 975 wholesale and distribution facilities in Illinois.

CICI has reviewed the testimony of all parties involved in this proposed rulemaking and believe that the data presented on behalf of the Illinois Association of Wastewater Agency's (IAWA) testimony represents sound science which supports the petition and a proposed set of standards which are attainable. The IAWA petition proposed to establish a seasonal dissolved oxygen standard that is protective of the early live stages of fish, aquatic insects and benthic organisms and establishes a minimum standard that is more stringent than that suggested by the U.S. Environmental Protection Agency in its National Criteria Document.

CICI has also reviewed the testimony of the Illinois Department of Natural Resources and Illinois Environmental Protection Agency. CICI does not believe that these agencies have provided the scientific evidence to support their proposed modifications of the IAWA petition. CICI opposes the establishment of river segments that would be subject to an even more stringent standard without the scientific basis to support the agencies' recommendation.

It is therefore that CICI supports the Illinois Association of Wastewater Agency (IAWA) petition designated R04-25.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lisa Frede".

Lisa Frede
Director of Regulatory Affairs
Chemical Industry Council of Illinois