

AMERICAN BOTTOMS
REGIONAL WASTEWATER TREATMENT FACILITY

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STATE OF ILLINOIS
Pollution Control Board

December 12, 2006

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

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

Dear Ms. Gunn:


The American Bottoms Regional Wastewater Treatment Facility would like to record its support for the Illinois Association of Wastewater Agency (IAWA), petition R04-25.

American Bottoms has followed the hearings closely and feels that the evidence supports the position of IAWA as originally filed. The IAWA petition would establish a dissolved oxygen water quality standard that is protective of the state's surface waters and biological resources. We feel that the petition is founded in good science and is attainable in the least disturbed water systems. The IAWA position would establish a seasonal dissolved oxygen standard that is protective of early live stages of fish, aquatic insects and benthic organisms and establish a minimum concentration of 3.5 mg/L, which is more protective than suggested in the USEPA National Criteria Document. Furthermore, IAWA has proven its case.

American Bottoms does not agree with the position supported by the Illinois Department of Natural Resources and the Illinois Environmental Protection Agency. The 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 especially are opposed to the establishment of river segments held to a different standard without the evidence to justify such a designation. An unattainable standard is worse than no standard at all.

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

Sincerely,


George R. Schillinger
Executive Director