



**URBANA &
CHAMPAIGN
SANITARY
DISTRICT**

ORIGINAL

RECEIVED
CLERK'S OFFICE

BOARD OF TRUSTEES

Christopher Alix
Diana Lenik
Jerry Lyke

DEC 15 2006

STATE OF ILLINOIS EXECUTIVE DIRECTOR
Pollution Control Board
Michael Little

1100 E UNIVERSITY AVENUE • PO BOX 669 • URBANA, IL 61803-0669 • Phone (217) 367-3409 • Fax (217) 367-2603

December 7, 2006

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

PC# 91

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

Dear Ms. Gunn:

The Urbana & Champaign 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 the IAWA as originally filed. The IAWA petition would establish a dissolved oxygen water quality standard that is protective of the states 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 lives stages fish, aquatic insects and benthic organisms and establish a minimum concentration of 3.5 mg/L, that is more protective than suggested in 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. 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 with out the evidence to justify such a designation.

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

Very truly yours,

URBANA & CHAMPAIGN SANITARY DISTRICT

Michael R. Little

Michael R Little
Executive Director