

December 15, 2006

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STATE OF ILLINOIS
Pollution Control Board

Illinois Pollution Control Board
Attention: Clerk
100 W. Randolph
James R. Thompson Center
Suite 11-500
Chicago, Illinois 60601
and via fax 312-814-3669; 2pages

PC#8

Re: PCB 06-171
Public Comment on American Bottom Conservancy Appeal of NPDES Permit
Horseshoe Lake / Canteen Lake, Madison County, Illinois

Since moving to Madison County nearly twenty years ago, I have frequented Horseshoe Lake State Park for a variety of purposes. Recently, I have observed increased access to the Lake via the bike trail that actually runs on an abandoned railroad right-of-way through GCS's facility property.

Several years ago, I was involved as an environmental consultant in the acquisition of Canteen Lake by a private party. The surface waters of the two lakes are interconnected. The State had interest in acquiring the property but decided that it was too "contaminated" and throughout the environmental assessment process was the concern of GCS's wastewater discharges into the Lakes' water system. While I am happy for my clients in acquiring the property, fact is, Illinois citizens lost access to this unique resource.

Over the years, I have been involved with the preparation and review of National Pollutant Discharge Elimination System (NPDES) permits. In recent years, I have noticed that the principle purpose of the permit, to *eliminate* the discharge of pollutants, is seemingly being lost. Rather than leading toward the elimination of pollutant discharges, they are being manipulated as an accepted manner to dispose of wastes into the waters of the State.

One way this is done is to use connected water resource units (surface water and/or groundwater) to in effect dilute the wastes to meet NPDES standards. In some cases, the primary use of the water resources becomes the dilution of wastes, before the wastes are discharged back into the connected water resources units. Dilution is not an accepted environmental management of wastes. Usually, this management involves some sort of "passive treatment" of wastewater, identified as a friendly sounding "artificial wetlands." But little of the wastes' pollutants are actually removed from the environment. Rather, the holding of the wastes allows the wastes to be diluted before being discharged to surface waters or leaching into the underlying groundwater.

Typically, NPDES permits are reviewed looking at the concentrations of pollutants being discharged into the waters "mixing zone." This is a concept of diluting wastewaters and

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is evident even to the casual observer. To properly evaluate the permit, the "treatment" of the wastewaters needs to be considered as to whether the *elimination* of pollutant discharges to (connected) water resources is being promoted by the permit.

Another element, that I believe is particular to this NPDES permit, is the discharge of pollutant types into a water resource of pollutants that would not normally be expected in the receiving waters which comes from the mixing of dissimilar wastewater streams, during or after 'treatment' and prior to discharge.

All too often, common sense public comments regarding environmental matters are responded to by saying, "we've considered the comment and decided to ignore it," to the detriment of our environmental resources as a whole.

Every time I observe from public access property the industrial wastewaters related to this permit, I question to myself the reasonableness of its management in the environment. I believe a great many of those who utilize not only the water resources of Horseshoe Lake itself and connected water resources, but also of environmental resources surrounding the state park, would attend a Public Hearing on NPDES discharges into the Lake, particularly if there is a proper public outreach effort toward them.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Johnson". The signature is written in a cursive, slightly slanted style.

Robert L. Johnson, PE
Senior Environmental Consultant
8 Cypress Point
Collinsville, Illinois
618/530-6604