

Thorn
Creek
Basin

SANITARY DISTRICT



Thomas E. Brabeo
President

Bernadette M. Morrison
Vice President - Treasurer

David M. Zerante
Clerk

Phyllis W. Monks
Attorney

James L. Daugherty
District Manager

Robert Bond
Plant Superintendent

Jennifer Hindel
District Engineer

Trudy Krygsheld
Finance Director

Eric A. Lindsay
Computer Network
Administrator

ORIGINAL

700 West Erie Ave. Chicago Heights, Illinois 60411
708/754-0525 Fax: 708/754-3940
www.thorncreek.dst.il.us

RECEIVED
CLERK'S OFFICE

DEC 19 2006

STATE OF ILLINOIS
Pollution Control Board

PC#97

December 19, 2006

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

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

Dear Ms. Gunn:

The Thorn Creek Basin Sanitary District supports the adoption of the petition as originally submitted by the Illinois Association of Wastewater Agencies (IAWA) in the proceeding R04-25. Thorn Creek has been on the service list for the subject proceeding and has reviewed the submittals by IAWA and all other parties in the matter. Thorn Creek believes that the IAWA proposal would establish a dissolved oxygen water quality standard that is protective of the state's surface waters and biological resources. The petition is founded in good science and is attainable in the water resources throughout the state. IAWA has stated and no one has disagreed that the current dissolved oxygen water quality standard is not science-based. IAWA's proposal is based on the US EPA National Criteria Document, and is in fact, more protective than suggested in the National Document.

The Illinois Environmental Protection Agency and the Illinois Department of Natural Resources have offered counter proposals in this matter. They should not be accepted for two reasons:

1. They have not provided scientific data that supports the derivation of their alternate limits.
2. There is no scientific evidence supporting the proposed enhanced standards for certain stream segments, including the requirement for higher dissolved oxygen standards. In fact, data provided by IAWA shows that the higher oxygen levels are not always present in the stream segments they report as having sensitive aquatic life.

DEC 19 2006 12:23p
Thorn Creek Sanitary District 700753010
p. 3 of 3

Ms. Dorothy Gunn, Clerk
Illinois Water Pollution Control Board
December 19, 2006
Page -2-

Thorn Creek appreciates this opportunity to offer comments in relationship to R04-25. Adoption of the original petition as submitted by IAWA is encouraged.

Very truly yours,



James L. Daugherty
District Manager

JLD:pm

cc: See Service List

FAX

Page 1 of 3

THORN CREEK BASIN SANITARY DISTRICT

700 West End Ave., Chicago Heights, IL 60411

Phone: 708-754-0525 Fax: 708-754-3940

TO: Clerk's Office
Illinois Water Pollution Control Board

FAX # 1-312-814-3669

FROM: James L. Daugherty

DATE: December 19, 2006

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

Attached please find my public comments on the above subject. I understand a fax copy is acceptable for submittal.

Thank you,

James L. Daugherty
District Manager