



ORIGINAL
City of LaSalle

La Salle County, Illinois

City Offices - 745 Second Street - La Salle, Illinois 61301-2599

www.lasalle-il.gov Fax: 815-223-9508

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DEC 28 2006

STATE OF ILLINOIS
Pollution Control Board

December 15, 2006

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

PC#99

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

Dear MS. Gunn:

The City of LaSalle would like to record its support for the Illinois Association of Wastewater Agency (IAWA), petition R04-25.

We have followed these hearings closely and feel that the evidence supports the position of the IAWA as originally filed. That filing would establish a dissolved oxygen water quality standard that is protective of Illinois' surface waters and biological resources. That petition is founded on good science and is attainable in the least disturbed water systems. The IAWA position appears to establish a seasonal dissolved oxygen standard that is more protective of fish, insect and benthic organisms than is suggested in the USEPA National Criteria Document. The dissolved oxygen minimum concentration of 3.5 mg/L is requested by IAWA.

We do not agree with the position supported by the Illinois Department of Natural Resources and the Illinois Environmental Protection Agency. These agencies have not proven their cases for their proposed dissolved oxygen concentrations in surface waters. The adoption of IEPA proposed concentrations would continue a water quality standard that is unattainable even in the least disturbed surface waters. The establishment of river segments held to a different standard without evidence to justify such a designation is of particular concern. We are concerned that establishing these conditions in regulatory form shall cause unnecessary and burdensome costs to the citizens of the State, and may be creating unreasonable requirements for communities that can otherwise meet the more achievable IAWA proposed standard.

Art Washkowiak
Mayor
City Office: 815-223-3755

Virginia Kochanowski
City Clerk
815-223-0077

Fran Baratta
City Treasurer
815-223-4720

Pam Broviak, P.E.
City Engineer/Dir. of Public Works
815-223-7041

Samuel T. McNeilly
Superintendent of Public Works
815-223-6344

Joanne M. Milby
Comptroller
815-223-4586

Attorney: James McPhedran of
Anthony Raccuglia & Associates
815-223-0230

Rob Uranich
Chief of Police
815-223-2131

Andy Baclidore
Fire Chief
815-223-0834

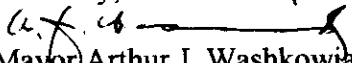
Brian Maddox
Building Inspector
815-223-2980

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We are also including weekly dissolved oxygen data point readings from January through August of 2006 generated by the City of LaSalle Wastewater Plant personnel. These data points have been monitored at the end of our chlorine contact tanks, effluent pumping well and Illinois River outfall. These may be of interest to IDNR or IEPA.

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

Sincerely,


Mayor Arthur J. Washkowiak

LASALLE WASTE WATER DISSOLVED OXYGEN READS

2006					
DATE	DAY	CONTACT CHAMBER	WET WELL	OUTFALL	INITIALS
11/15	M	1.83 / 11.5	6.80 / 11.5	7.96 / 11.3	MC/JM
1/23	M	1.81 / 12.0	6.72 / 12.0	8.30 / 12.0	JM/RB
1/30	M	2.49 / 11.9	7.50 / 11.9	8.47 / 11.9	JM/KD
2/6	M	2.78 / 11.3	7.35 / 11.2	8.81 / 11.3	JM/RB
2/13	M	3.29 / 11.1	7.31 / 11.1	8.70 / 11.2	JM
2/20	M	2.70 / 10.4	7.21 / 10.4	8.42 / 10.5	JM
2/27	M	3.33 / 11.3	7.63 / 11.1	9.25 / 10.9	RB
3/6	M	2.17 / 11.0	6.94 / 10.9	8.33 / 10.9	RB
3/14	T	2.79 / 11.3	7.40 / 11.0	9.17 / 9.7	JM
3/20	M	2.44 / 12.0	6.66 / 12.0	9.34 / 8.7	JM
3/27	M	2.34 / 12.3	6.60 / 12.3	7.84 / 12.3	JM
4/3	M	4.47 / 11.7	7.43 / 11.7	7.87 / 11.8	JM
4/10	M	1.38 / 13.0	6.29 / 13.1	7.78 / 13.0	RB
4/18	T	2.1 / 14.1	6.47 / 13.8	RIVER FLOODED	JM
4/24	M	1.97 / 14.9	5.97 / 14.9	6.80 / 15.0	JM
5/1	M	1.41 / 14.6	5.82 / 14.6	8.22 / 14.6	JM
5/8	M	3.13 / 15.8	6.51 / 15.8	7.85 / 15.7	RB
5/15	M	2.45 / 14.9	6.32 / 14.9	7.32 / 15.2	JM
5/22	M	2.27 / 15.7	6.57 / 15.7	7.80 / 15.8	JM
5/30	T	2.00 / 18.7	6.28 / 18.2	6.40 / 18.1	JM
6/5	M	2.07 / 18.5	6.21 / 18.1	7.21 / 18.3	JM
6/12	M	2.34 / 17.3	6.22 / 17.1	7.34 / 17.3	JM
6/19	M	1.69 / 19.7	5.68 / 19.4	6.82 / 19.3	JM
6/26	M	3.19 / 19.6	6.16 / 19.6	7.07 / 19.6	JM
7/3	M	1.43 / 21.1	5.43 / 20.7	6.80 / 20.6	JM
7/10	M	2.15 / 20.9	5.55 / 20.9	6.82 / 20.9	JM
7/17	M	1.68 / 21.9	5.64 / 21.7	7.12 / 20.7	MC
7/24	M	2.35 / 22.0	5.68 / 21.7	7.05 / 21.7	MC
7/31	M	2.57 / 22.3	5.66 / 23.0	6.65 / 22.8	KD
8/7	M	2.37 / 22.7	5.43 / 22.7	5.87 / 22.4	RB
8/14	M	2.98 / 23.0	5.77 / 23.0	6.73 / 22.9	RB
8/21	M	2.15 / 21.4	5.65 / 21.9	6.94 / 22.4	JM
8/28	M	1.85 / 22.3	4.62 / 22.3	6.88 / 22.5	JM