

ORIGINAL



SIERRA CLUB
FOUNDED 1892

ILLINOIS CHAPTER
70 East Lake Street • Suite 1500 • Chicago, IL 60601

tel: 312.251.1680
fax: 312.251.1780
web: illinois.sierraclub.org

January 16, 2007

Sent via fax to 312.814.3669

John Therriault, Deputy Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, Illinois 60601

PC#10

RECEIVED
CLERK'S OFFICE

JAN 16 2007

STATE OF ILLINOIS
Pollution Control Board

Re: PCB 06-171 Third Party NPDES Permit Appeal- American Bottom Conservancy v. IEPA and US Steel-Granite City Works

Dear Mr. Therriault:

It appears that the fax of Sierra Club comments on this permit appeal which I sent on December 18, 2006 did not go through. I have attached the 2-page comment letter as well as the fax report from that day. These comments were to reinforce that the testimony given by Jason Warner at the November 20, 2006 hearing in Edwardsville were made on behalf of the Illinois Chapter of the Sierra Club.

You can reach me at 815-675-2594, cindy.skrukud@sierraclub.org or via mail to: 4209 W Solon Rd, Richmond, IL 60071.

Sincerely,

Cynthia L. Skrukud, Ph.D.
Clean Water Advocate



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Sent via fax to 312.814.3669

Dorothy M. Gunn
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, Illinois 60601

ORIGINAL

December 18, 2006

RECEIVED
CLERK'S OFFICE

JAN 16 2007

STATE OF ILLINOIS
Pollution Control Board

Re: PCB 06-171 Third Party NPDES Permit Appeal- American Bottom Conservancy v. IEPA and US Steel-Granite City Works

Dear Ms. Gunn:

The Sierra Club is a not-for-profit organization with over 25,000 members in the State of Illinois. Sierra Club members are very concerned about water quality and believe, as Congress believed when it passed the Clean Water Act, that discharges of pollutants should be minimized to the extent possible and eventually eliminated.

We urge the Illinois Pollution Control Board to assure that members of the public be able to fully participate in the National Pollutant Discharge Elimination System permit process. Opportunity for active public participation in the process is required by the Clean Water Act and is necessary for the system to work properly.

The Board should require that the Agency hold a hearing whenever organizations with numerous members that may be affected by a discharge request one. The time frame now allowed for public comment is not long and requests for time extensions are often denied. The decision to request a public hearing almost always must be made with very limited information being available to the public. It cannot reasonably be expected that comment letters and requests for public hearing will articulate all the issues potentially raised by the permit or will articulate problems perfectly.

Further, it is not good policy to force people who have only received the initial public notice to generate large numbers of objection letters and requests for a hearing if a hearing is to be held. By doing this, the Agency is practically ordering people who care about the environment to send out mass alerts and go to the press without their having had a real opportunity to determine the extent to which the proposed action will affect human health or other parts of the environment.

There may be dischargers and agency officials who think that forcing environmental groups and neighborhood organizations to react quickly with little information saves time and resources. In a few cases it will be possible this way to push through a permit that might otherwise have required more debate. However, the people who want to push through permits without giving people a realistic chance to learn about them may learn that the results of forcing people to act in a few days on the basis of very limited information are not good in the long run. If the Board and the Agency wish to serve the interests

Sierra Club, Illinois Chapter on PCB 06-171

page 2

of the environment and effective government, they should assure members of the public that they will have an opportunity to learn about proposed permits and will be able to object later if the explanations offered by the discharger and the Agency are not satisfactory.

You can reach me at 815-675-2594, cindy.skrukrud@sierraclub.org or via mail to: 4209 W Solon Rd, Richmond, IL 60071.

Sincerely,



Cynthia L. Skrukrud, Ph.D.
Clean Water Advocate

* x x Memory TX Result: Failure 1 Dec 18, 2006 3:53PM * * *

Date Time: Dec 18, 2006 3:47PM

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ORIGINAL

RECEIVED
CLERK'S OFFICE

JAN 16 2007

STATE OF ILLINOIS
Pollution Control Board

Reason for error: 1) Hanging up on line fail 2) Busy
 2) No answer 3) No face/mile connection
 3) Exceeded max. E-mail size 4) No



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December 18, 2006

Sent via fax to 312.814.3609

Dorothy M. Gunn
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph St., Ste. 11-500
Chicago, Illinois 60601

Re: PCB 06-177 Third Party NPDES Permit Appeal- American Hottton Conservancy v. IRPA and US Steel-Granite City Works

Dear Ms. Gunn:

The Sierra Club is a not-for-profit organization with over 25,000 members in the State of Illinois. Sierra Club members are very concerned about water quality and believe, as Congress believed when it passed the Clean Water Act, that discharges of pollutants should be minimized to the extent possible and eventually eliminated.

We urge the Illinois Pollution Control Board to assure that members of the public be able to fully participate in the National Pollutant Discharge Elimination System permit process. Opportunity for active public participation in the process is required by the Clean Water Act and is necessary for the system to work properly.

The Board should require that the Agency hold a hearing whenever organizations with numerous members that may be affected by a discharge request one. The time frame now allowed for public comment is not long and requests for time extensions are often denied. The decision to request a public hearing almost always must be made with very limited information being available to the public. It cannot reasonably be expected that comment letters and requests for public hearing will articulate all the issues potentially raised by the permit or will articulate problems perfectly.

Further, it is not good policy to force people who have only received the initial public notice to generate large numbers of objection letters and requests for a hearing if a hearing is to be held. By doing this, the Agency is practically ordering people who care about the environment to send out mass alerts and go to the press without their having had a real opportunity to determine the extent to which the proposed action will affect human health or other parts of the environment.

There may be dischargers and agency officials who think that forcing environmental groups and neighborhood organizations to react quickly with little information saves time and resources. In a few cases it will be possible this way to push through a permit that might otherwise have required more debate. However, the people who want to push through permits without giving people a realistic chance to learn about them may learn that the results of forcing people to act in a few days on the basis of very limited information are not good in the long run. If the Board and the Agency wish to serve the interests