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STATE OF ILLINOIS
Pollution Control Board

September 8, 2007

Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph
Suite 11-500
Chicago, Illinois 60601

PC#9
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Re: AS 07-2 Proposed Extension of Adjusted Standard Applicable to
Illinois-American Water Company's Alton Public Water Supply Facility
Discharge to the Mississippi River

American Bottom Conservancy strongly opposes the proposed extension of the adjusted standard for Illinois-American Water Company for its Alton discharge into the Mississippi River. We support the August 21, 2007, comments of Environmental Law & Policy Center, Prairie Rivers Network and Sierra Club and the recommendation of the Illinois Environmental Protection Agency requesting denial.

While we appreciate the work being done by Great Rivers Land Trust to remove sediment upstream through its ~~Piasa Creek watershed project, we encourage them to seek~~ funding elsewhere for this worthwhile project.

Trading or seeking offsets to avoid technology-based effluent limits is unacceptable under the Clean Water Act. Additionally, it is our understanding that not only is Illinois-American redepositing sediment it has removed from the river, it is also discharging additional material used in the water treatment process. Illinois-American and upstream communities cite the savings to their Alton area rate-payers, but no consideration is given to the cost of removal of redeposited sediment and additional discharged toxins at Illinois-American facilities downstream, including Granite City and East St. Louis, which costs must be borne by downstream rate-payers.

Once sediment is removed from the river it should not be returned.

This adjusted standard is unacceptable and we believe it should not have been initially approved. We urge the Board to deny the extension. Thank you for your consideration of our comments.

Sincerely,



Kathy Andria
President.