BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	
WATER QUALITY STANDARDS AND	)	
EFFLUENT LIMITATIONS FOR THE	)	R08-9
CHICAGO AREA WATERWAY SYSTEM	)	(Rulemaking – Water)
AND THE LOWER DES PLAINES RIVER:	)	
PROPOSED AMENDMENTS TO 35 ILL.	)	
Adm. Code Parts 301, 302, 303, and 304	)	

NOTICE OF FILING

To:

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Persons on the attached service list

Please take notice that today I filed with the office of the Clerk of the Pollution Control Board **Prefiled Questions of the Natural Resources Defense Council to Keith Tolson**, a copy of which is hereby served on you.

_____
Ann Alexander

Dated: August 22, 2008

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CERTIFICATE OF SERVICE

I, Ann Alexander, the undersigned attorney, hereby certify that I have served the attached **Prefiled Questions of the Natural Resources Defense Council to Keith Tolson** on all parties of record (Service List attached), by depositing said documents in the United States Mail, postage prepaid, from 227 W. Monroe, Chicago, IL 60606, before the hour of 5:00 p.m., on this 22nd Day of August, 2008.

_____

Ann Alexander, Natural Resources Defense Council

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WATER QUALITY STANDARDS AND	)	
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PROPOSED AMENDMENTS TO 35 ILL.	)	
Adm. Code Parts 301, 302, 303, and 304	)	

PREFILED QUESTIONS OF NATURAL RESOURCES DEFENSE COUNCIL TO KEITH TOLSON

The Natural Resources Defense Council hereby files questions to Keith Tolson:

1. Please describe the role of the following identified contributors to the Risk Assessment, including the approximate number of hours contributed: yourself, Chriso Petropoulou, Patterson Environmental Consultants (PEC); Cecil Lue-Hing & Associates (CLHA); Dr. Charles Gerba of the University of Arizona (UA); Hoosier Microbiological Laboratory, Inc. (HML); and Clancy Environmental Consultants, Inc. (CEC)

2. Do you have any formal training in microbiology?

3. Are you familiar with the review of an interim version of the risk assessment prepared by Tim Wade of USEPA? Did you ever have any discussions with Tim Wade regarding his concerns?

4. What was the basis for selection of gastrointestinal illness as the sole risk to be assessed? Is it your view that gastrointestinal illness is the predominant type of illness associated with waterborne pathogens?

5. Approximately how many types of waterborne human pathogens are known to be associated with sewage overall?

6. What were the bases for selection of the 8 different pathogens studied in the Risk Assessment?

7. Did the risk assessment take into account populations that are potentially more sensitive to pathogens, and may more easily become ill or suffer severe effects, such as children, pregnant women, and immunocompromised persons?

8. Did the Risk Assessment find that upstream concentrations of pathogens were generally lower than downstream concentrations during dry weather?

9. For purposes of assessing risk in the presence of disinfection, did you average the upstream and downstream sampling concentrations?

10. In assessing post-disinfection risk, did you also combine data from wet and dry weather conditions?

11. Regarding your statement at p. 6 of your testimony that "disinfection of the effluent outfall was predicted to result in a decrease in effluent pathogen loads from the water reclamation plants but have little effect on overall pathogen concentrations in the waterway." Does that statement concern wet weather conditions? Does it apply to specifically dry weather conditions?

12. Regarding the data in Table 5-8 – Describe how you arrived at these numbers.

13. Regarding the statement at p. 5 of your testimony that the "UAA study was the primary source for exposure use data for the CAWS" -- Is it possible that a waterbody that was perceived as cleaner than the CAWS might receive heavier use for activities involving substantial body contact with water?

14. Is it your understanding that waterborne pathogen levels can vary with the degree of sunlight on the water? With the turbidity of the water? With the temperature?

15. What was the basis for using dose-response data for echovirus was as a surrogate for the dose-response behavior of adenovirus?

16. How did you disinfect your sampling equipment between collections?

17. How large were the samples you collected for virus analysis? What volume of each of those samples was typically analyzed for each of the viruses?

18. What primers were used for the calicivirus analyses? Which caliciviruses are detected using those primers?

19. The Risk Assessment states that Blue Green Monkey Kidney cells were used for the positive and negative virus control assays

20. What method was used to analyze samples for adenoviruses?

    a. What serotypes of adenoviruses are detected using the cell culture line you used?

b. What primers were used for the PCR analysis? What serotypes of adenoviruses are detected using those primers?

21. Regarding Tables 3-5a through 3-5f of the Risk Assessment, the Risk Assessment states that these present a summary of the total enteric virus analytical results. What method was used to detect enteric viruses?

22. Regarding the statement in the Risk Assessment that reverse transcription polymerase chain reaction (RT-PCR) results were used to calculate the concentrations of noroviruses in the water samples -- how were these calculations performed?

23. Did the secondary infection rates you used in your analysis change between the interim dry weather risk assessment report completed in November, 2006 and the final wet and dry weather risk assessment?

24. Did you use a Monte Carlo simulation in quantifying risk? Please describe how that was done.