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December 15, 2006

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STATE OF ILLINOIS  
Pollution Control Board

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

PC#92

Re: Pollution Control Board Rule R04-25

Dear Ms. Gunn:

www.strand.com

Strand Associates, Inc. supports the adoption of petition R04-25 as it was originally submitted by the Illinois Association of Wastewater Agencies (IAWA). We are an affiliate member of IAWA and have been tracking this issue closely. We believe the original petition is scientifically justified, attainable, and economically feasible. The proposed dissolved oxygen standard provides a long-overdue revision of the original standard that was not scientifically sound for Illinois. The IAWA has proposed a standard that implements the recommendations of the National Criteria Document (NCD), published by the United States Environmental Protection Agency to provide guidance to individual states when setting water quality standards to meet the provisions set forth in the Clean Water Act. The IAWA's proposal is more protective of aquatic life than the NCD.

The counter proposal offered by the Illinois Environmental Protection Agency (IEPA) and the Illinois Department of Natural Resources (IDNR) should not be adopted by the Illinois Pollution Control Board. It is not acceptable for several reasons, most notably the seemingly arbitrary designation of "enhanced" stream segments requiring higher dissolved oxygen standards. There is no scientific evidence indicating that the proposed enhanced standards are attainable in Illinois waterways or necessary for the protection of diverse aquatic life. Some of our clients have completed stream dissolved oxygen monitoring with conclusions that greatly differ from the IEPA and IDNR's assumptions. The Board now has this data. We do not believe the Board should hold certain water segments to a higher standard without the evidence to support such a designation.

We encourage the Board to adopt the IAWA petition R04-25 as originally filed.

Sincerely,

STRAND ASSOCIATES, INC.

Jane M. Carlson, P.E.

Troy W. Stinson, P.E.

c: Service List