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STATE OF ILLINOIS
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January 2, 2007

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

PC# 106

Re: Proposed Amendments to Dissolved Oxygen Standard
35 Ill Adm Code 302.206
Pollution Control Board Rule R04-25

Dear Ms. Gunn:

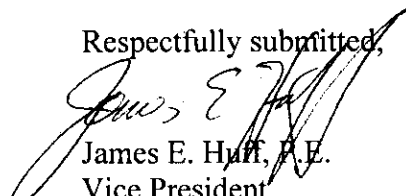
For the past 35 years I have been active not only in the development of water quality standards in Illinois, but also stream monitoring throughout much of Illinois. It has been widely known for many years that the existing minimum dissolved oxygen (D.O.) water quality standard (5.0 mg/L) was not being achieved, when proper (early morning) readings were being collected. This is not an isolated problem but occurs throughout most, if not all, of the Illinois streams.

The Illinois Association of Wastewater Agencies (IAWA) petition would establish a dissolved oxygen standard that is protective of early live stages of fish, aquatic insects and benthic organisms and establish a minimum concentration of 3.5 mg/L that is more protective than suggested in the U.S. EPA national Criteria Document. Equally important, this minimum D.O. standard is attainable in a vast majority of Illinois streams that have had minimal disturbance.

While the Illinois EPA and IDNR have offered an alternative petition that if adopted, will result in continued violations on streams with little disturbances, and without any demonstrated benefit. To the extent these agencies believe there are unique aquatic ecosystems that require unique D.O. standards, it would seem each segment should be presented as a unique petition to the Board with the supporting site specific data to support such petitions. This is no different than the requirements on site-specific rule changes currently.

In summary, I would encourage the Board to adopt IAWA's D.O. petition, and direct the Illinois EPA and IDNR to bring site specific petitions for each unique waterway.

Respectfully submitted,


James E. Huff, P.E.
Vice President
Huff & Huff, Inc.