From: Carol McCoy <mccoy2003@sbcglobal.net>
To: <therriaj@ipcb.state.il.us>
Date: 6/24/2011 5:22 PM
Subject: Protect Chicago River from Dirty Sewage

PC# 1045

Jun 24, 2011

Mr. John Therriault
100 West Randolph St., Ste 11-500
Chicago, IL 60601

Dear Mr. Therriault,

As a supporter of American Rivers, I am writing to ask you to kill the pathogens that are contained in the sewage released into the Chicago River every day.

Directly connected to the toilets of Cook County, more than 70 percent of the water in the river is from MWRD plants, and while it receives basic treatment, pathogens remain from human sewage that can harm the thousands of people who use the river. These microorganisms are of particular concern for some special populations, like kids, who have a higher risk of contracting a waterborne illness and have no way of knowing what is in the water. Due to this pollution concern, American Rivers has named the Chicago River one of America's Most Endangered RiversTM of 2011.

The Chicago River has become a true community resource with all kinds of wildlife, new riverfront parks, residential communities, restaurants, and businesses that are dependent on a healthy river. As a region we have spent billions of dollars to clean up the river, but we have not finished the job.

As you know, the U.S. EPA has recently notified Illinois EPA that they must enact stricter regulations that protect the public from the polluted water of the Chicago River. I request that you proactively take steps to tackle the issue of disinfection to protect the citizens of Chicago.

The Clean Water Act requires that we continually improve our waterways to the greatest extent possible. The law clearly states that we need to keep trying until we get it right. The Illinois EPA, and now the U.S. EPA, have recognized that it is time to improve our water quality and establish new standards for how we treat the river. We support the national and state EPA, and call on you to take responsibility for cleaning up the sewage effluent in Chicago's water.

Please begin work immediately to implement the changes needed to begin disinfection of the water destined for the Chicago River.

Thank you for considering my request.

Sincerely,

Sincerely,

Mrs. Carol McCoy
18113 Sacramento Ave
Homewood, IL 60430-1421

June 26, 2011

Mr. John Therriault
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

PC#1044

Subject: Docket R08-9A Public Comment

On June 16, 2011 the Illinois Pollution Control Board (IPCB) issued its amended Second Order in the subject rulemaking in which the use designation of the Upper North Shore Channel (UNSC) is Incidental Contact Recreation (ICR) and the use designation of the Lower North Shore Channel (LNSC) and reaches of the Chicago Area Waterways (CAWS) downstream of the LNSC is Primary Contact Recreation (PCR).

The IPCB has yet to issue an order in Docket R08-9B stating the recreational water quality standards for PCR and ICR. Presumably the standards will differ in numerical value. The standards will certainly require effluent disinfection for the North Side Water Reclamation Plant (NSWRP) owned and operated by the Metropolitan Water Reclamation District of Greater Chicago (MWRD). It is also possible that the standards will also require the treatment of other point sources, namely the combined sewer overflow (CSO) and stormwater outfalls permitted to the MWRD and other municipalities.

At first glance, the use designation of ICR for the UNSC appears appropriate to the writer as I have observed on numerous occasions paddle boating activity on the UNSC, principally originating at docks operated by the City of Evanston at the Evanston Ecology Center at Bridge Street and by the Skokie Park District at the Dammrich Rowing Center at Oakton Street. On these numerous occasions I have never observed anyone diving or jumping into the water.

The IPCB has explained its rationale for the use designation of the UNSC, yet it did not consider it relevant or it inadvertently overlooked the fact that the UNSC conveys flow from Lake Michigan diverted by the MWRD under an Illinois Department of Natural Resources Lake Michigan Allocation Order (LMO) generally during the months of May through October each year. There is no limit on the MWRD when it can divert water from Lake Michigan into the North Shore Channel. At their discretion, MWRD can divert for 12 months of the year. Thus, for at least half of the year the UNSC is flowing into the LNSC. Further, following a wet weather overflow event during any time of the year, CSO and stormwater flows downstream from the UNSC into the LNSC.

Further, in the testimony for Dockets R08-9C and 9D, the MWRD has presented the technologies it may pursue to provide low-flow augmentation and aeration in the UNSC to meet proposed aquatic life water quality standards. Low-flow augmentation may be practiced for the entire year. It appears reasonable that the MWRD may have to provide low-flow augmentation in

the UNSC to meet the uses and water quality standards eventually adopted by the IPCB in these other dockets.

Unless the water in the UNSC is protected with recreational water quality standards as stringent as those for the LNSC, water flowing from the UNSC into the LNSC will negate the effect of effluent disinfection at the NSWRP and recreational water quality standards will not be met in the LNSC and reaches downstream of the LNSC.

The July 16, 2011 Second Order also designated the Chicago River and the Little Calumet River from its confluence with the Calumet River and the Grand Calumet River to the Calumet-Sag Channel as PCR. In both reaches, conditions are similar to the UNSC in that Lake Michigan water is being diverted by the MWRD under the LMO and CSO events occur. It would be consistent for the UNSC to be designated as PCR as well.

The writer has reviewed fecal coliform data for 2007, 2008 and 2009 available on the MWRD web site. Ambient monitoring data at Oakton Street (Monitoring Location #102) at the downstream end of the UNSC showed that for 34 samples collected, 15 results ranged from 1,900 to 32,000 counts per 100 ml. In these 15 sample results, 44 percent of all samples, the fecal coliform exceeded the current primary contact standard for General Use Waters. The high fecal coliform results coincide with CSO events. For these CSO events and numerous others when samples are not taken, water in the UNSC laden with fecal coliform and other microorganisms has flowed into the LNSC. CSO events have occurred and primary contact standards have been violated for the past 20+ years that the UNSC has been designated as General Use.

A review of similar data for the same period at Central Street near the upstream end of the UNSC (Monitoring Location #35) showed that for 27 samples collected, 4 results ranged from1,300 to 8,100 counts per 100 ml. At this location, 15 percent of all samples exceeded the current primary contact standard for General Use Waters.

The writer encourages the IPCB to change its order of the recreational use designation of the UNSC from ICR to PCR at the next opportunity.

Thank you for your consideration.

Dick Lanyon, PE2
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