

ILLINOIS POLLUTION CONTROL BOARD  
March 28, 1972

In the Matter of     )  
                          )  
PLANT NUTRIENTS     )                             #R 71-15

Concurring Opinion (by Mr. Currie):

I join the Board's opinion both because I agree with its disposition of this proceeding and because the opinion contains valuable insights into these problems by Mr. Aldrich, who is intimately familiar with this subject. I think it important, however, to add a few words clarifying my own view of what we are doing and why.

The central question before us, as I see it, is whether or not to do something about nitrogen fertilizers. I think the important thing is that the Board has found there are violations of existing health-related water quality standards for nitrate nitrogen; that agricultural runoff contributes to these violations; and that the Institute is requested to propose an implementation plan for achieving compliance. If the Institute's study shows that compliance is not worth the cost, we ask that a new standard be proposed. But as matters stand now, a health-related standard is being violated, and we are asking the Institute to tell us what to do about it.

It should be clear that in asking the Institute for information we are in no sense deciding today that the use of fertilizer should or should not be restricted or that treatment of runoff should or should not be provided. We are not deciding the merits of the nitrogen controversy today. If we were we would not have referred the matter to the Institute.

With regard to phosphorus, I agree for the reasons given by Mr. Lawton in In the Matter of Detergent Phosphate Ban, #R71-10 (March 14, 1972), that there is inadequate proof of the need for statewide controls since the adverse effect of phosphorus on flowing streams, as contrasted with impoundments, has not generally been demonstrated.

  
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I, Christan Moffett, Clerk of the Pollution Control Board, certify that Mr. Currie filed the above Concurring Opinion this 28th day of March.

  
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