

ILLINOIS POLLUTION CONTROL BOARD
January 3, 1975

IN THE MATTER OF
PUBLIC WATER SUPPLIES

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R73-13

DISSENTING OPINION (by Mr. Dumelle):

I cannot vote for this regulation. The nitrate standard with the compromise "Note (b)" may be a hazard to public health.

The table of limits for nitrate-nitrogen purports to set the limit at 10 mg/l but "Note (b)" allows levels up to 20 mg/l for 15 days at a time.

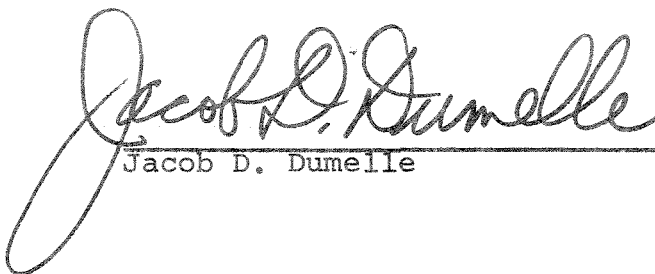
There is not one scintilla of evidence that 15 days of ingestion of 20 mg/l nitrate-nitrogen water is safe; either for babies, for pregnant women or for adults with glucose-6 enzyme deficiency. Mr. Marder himself has stated that he set the 15-day period as a compromise between a flat prohibition of any levels above 10 mg/l and the Agency's desire for unlimited periods up to 20 mg/l. Perhaps even two days of ingestion at 20 mg/l is too much let alone fifteen days. We just do not know.

The notice provisions of "Note (b)" will be imperfectly administered. All of us have had the experience of missing events announced in the newspapers or over the radio or television. The same lack of communication will happen with this regulation. Many people, and especially those ghetto residents without pediatricians, will not know when high-nitrate water runs in their taps. They may mistakenly boil water and thus concentrate the nitrates even more. And a young baby or an enzyme-deficient adult will suffer, perhaps fatally, because of this regulation.

Methemoglobinemia can be fatal. It is commonly detected as cyanosis and that from the blue lips of a child. Will a black baby in the ghetto show these symptoms before damage occurs? Will the mothers know enough to go to a doctor when their child's fingertips and lips become blue? To ask the question is to answer it. Some will not and the damage will occur.

In summary, the nitrate regulation with "Note (b)" is not soundly based. And it will be imperfectly administered at the best.

I would hope that the soon-to-be-promulgated Federal Drinking Water Standards would hold to the 1962 nitrate-nitrogen standard of 10 mg/l. Far better to put safe water into people's homes at all times than to try to reach them via electronic and print media to prevent them from drinking water which was safe the day before.



Jacob D. Dumelle

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify the above Dissenting Opinion was submitted on the 2nd day of June, 1975.



Christan L. Moffett, Clerk
Illinois Pollution Control Board