

ORIGINAL

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

RECEIVED
CLERK'S OFFICE

FEB 25 2002

IN THE MATTER OF:)
)
WATER QUALITY TRIENNIAL REVIEW)
AMENDMENTS TO 35 ILL. ADM. CODE)
302.208(e)-(g), 302.504(a), 302.575(d), 303.444,)
309.141(h); AND PROPOSED 35 ILL. ADM.)
CODE 301.267, 301.313, 301.413, 304.120, AND)
309.157)

R02-11
(Rulemaking-Water)

STATE OF ILLINOIS
Pollution Control Board

P. C. #2

NOTICE OF FILING

TO: Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601
(VIA FIRST CLASS MAIL)

Marie E. Tipsord
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601
(VIA FIRST CLASS MAIL)

(PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have filed today with the Clerk of the Illinois Pollution Control Board an original and nine copies of **COMMENTS OF THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP**, copies of which are herewith served upon you.

Respectfully submitted,
ILLINOIS ENVIRONMENTAL
REGULATORY GROUP,

By: *Robert A. Messina*
One of Its Attorneys

Dated: February 20, 2002

Robert A. Messina
Illinois Environmental Regulatory Group
215 East Adams Street
Springfield, Illinois 62701
(217) 522-5512

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD FEB 25 2002

IN THE MATTER OF:)
)
WATER QUALITY AMENDMENTS TO)
35 Ill. Adm. Code 302.208(e)-(g), 302.504(a),)
302.575(d), 303.444, 309.141(h); and)
PROPOSED 35 Ill. Adm. Code 301.267,)
301.313, 301.413, 304.120, and 309.157)

STATE OF ILLINOIS
Pollution Control Board

R02-11
(Rulemaking - Water)

COMMENTS OF
THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP

NOW COMES the ILLINOIS ENVIRONMENTAL REGULATORY GROUP (“IERG”), by one of its attorneys, Robert A. Messina, and submits the following comments in the above-referenced matter to the Illinois Pollution Control Board (“Board”), stating as follows:

The Illinois Environmental Regulatory Group (IERG) submits the following comments in support of the proposed rulemaking entitled “Water Quality Triennial Review (R02-11).” IERG thanks the Illinois Pollution Control Board (“Board”) for the opportunity to submit these comments today. IERG reserves the right to supplement or modify these comments at the close of testimony.

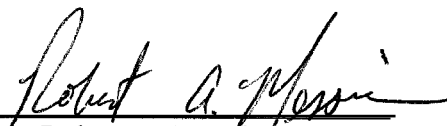
IERG is a not-for-profit Illinois corporation comprised of 70 member companies engaged in industry, commerce, agriculture, and other related activities, that are regulated by governmental agencies that promulgate, administer or enforce environmental laws and regulations. IERG was organized to promote and advance the interests of its members before governmental agencies, such as the Illinois Environmental Protection Agency and Illinois Pollution Control Board, and before judicial bodies, such as the Illinois Courts. Moreover, IERG is an affiliate of the Illinois State Chamber of Commerce, which has

more than 5,000 members in the State. Finally, a great number of IERG's members would be affected by this rule.

IERG first became involved in this matter in the fall of 2000, at which time the Illinois EPA began to circulate drafts of the proposal to various interested parties, including members of both the regulated and environmental communities. IERG has reviewed the proposal and shared it with our members. We believe that the proposal is reasonably and technically astute, and that Illinois EPA relied upon sound science and methodologies in developing this proposal. In short, IERG supports the Agency's efforts, and urges the Board to adopt the amendments to 35 Ill. Adm. Code 302.208(e)-(g), 302.504(a), 302.575(d), 303.444, 309.141(h), and language found at 35 Ill. Adm. Code 301.267, 301.313, 301.413, 304.120, and 309.157 as proposed.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
REGULATORY GROUP,

By: 
Robert A. Messina

Dated: February 20, 2002

Robert A. Messina
Illinois Environmental Regulatory Group
215 East Adams Street
Springfield, Illinois 62794-9276
(217) 522-5512

CERTIFICATE OF SERVICE

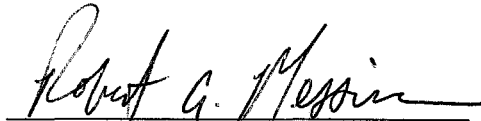
I, Robert A. Messina, the undersigned, certify that I have served a copy of the
COMMENTS OF THE ILLINOIS ENVIRONMENTAL REGULATORY GROUP,
upon:

Dorothy M. Gunn
Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

Marie E. Tipsord
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, Illinois 60601

SEE ATTACHED SERVICE LIST.

by depositing said documents in the United States Mail in Springfield, Illinois on
February 20, 2002.


Robert A. Messina

SERVICE LIST

Mike Callahan
Bloomington Normal Water Reclamation District
P O Box 3307
Bloomington, IL 61702-3307

Irwin Polls
Water Reclamation District
of Greater Chicago
6001 W. Pershing Rd.
Cirero, IL 60804-4112

Larry Cox
Downers Grove Sanitary District
2710 Curtiss Street
Downers Grove, IL 60515

Sanjay Sofat
Illinois Environmental Protection Agency
1021 N Grand Ave E P O Box 19276
Springfield, IL 62794-9276

Dennis Duffield
Department of Public Works City of Joliet
921 E Washington
Joliet, IL 60433-1267

Marie E. Tipsord
IL Pollution Control Board
100 W. Randolph St., Ste. 11-500
Chicago, IL 60601

Albert Ettinger
Environmental Law & Policy Center
35 E Wacker Drive Ste 1300
Chicago, IL 60601-2110

Lisa Frede
Director of Regulatory Affairs
Chemical Industry Council of Illinois
9801 W Higgins Rd Ste 515
Rosemont, IL 60018

Dorothy M. Gunn
Clerk
IL Pollution Control Board
100 W. Randolph Ste. 11-500
Chicago, IL 60601

James T. Harrington
Ross & Hardies
150 N. Michigan Ave., Ste. 2500
Chicago, IL 60601-7567

Katherine D. Hodge
Hodge Dwyer Zeman
3150 Roland Avenue P O Box 5776
Springfield, IL 62705-5776

Margaret Howard
Hedinger & Howard
1225 South Sixth Street
Springfield, IL 62703

Tom Muth
Fox Metro Water Reclamation District,
682 State Route 31
Oswego, IL 60543