



GREATER PEORIA SANITARY DISTRICT

ORIGINAL

RECEIVED
CLERK'S OFFICE

MAR 4 - 2002

STATE OF ILLINOIS
Pollution Control Board

February 28, 2002

Illinois Pollution Control Board
Attn: Dorothy Gunn, Clerk, Docket R02-11
James R. Thompson Center
100 West Randolph Street
Suite 11-500
Chicago, IL 60601

P.C. #5

Dear Board Members:

The Greater Peoria Sanitary and Sewage Disposal Districts supports the IEPA filing to define the BOD effluent standard specifically as carbonaceous BOD. This filing documents current practice in applying the intent of the regulations to permits.

Effluent limits for carbonaceous oxygen demand have historically been interpreted and permitted based on the CBOD test. The intent of this parameter is to determine and regulate treatment plant performance in regards to carbonaceous oxygen demand. The BOD effluent parameter was not intended to reflect any portion of the oxygen demand in converting ammonia nitrogen to nitrate nitrogen. Effluent and water quality standard for all forms of nitrogen are well documented in other sections of the regulations.

The Illinois Environmental Protection Agency is commended for their initiative in filing this document. Current permitting practice follows the intent of the regulation and is well accepted by the permitting, regulated and enforcement communities. This filing clearly defines current interpretation of the intent of the regulation.

The Greater Peoria Sanitary and Sewage Disposal District requests your favorable consideration of the Agencies filing.

Sincerely,

GREATER PEORIA SANITARY DISTRICT

Stanton A. Browning
Stanton A. Browning
Executive Director

