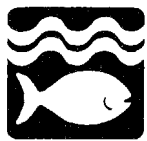


ORIGINAL



Fox Metro Water Reclamation District

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R.H. Locke, President
M.K. Detzler, Vice President
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G.V. Griffin, Engineer

March 01, 2002

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

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STATE OF ILLINOIS
Pollution Control Board

re: Docket R02-11

P.C. #7

Most Honorable Board Members:

My name is Thomas F. Muth and I am the District Manager for the Fox Metro Water Reclamation District (Fox Metro). I have worked for Fox Metro (formerly the Aurora Sanitary District) since July, 1987.

Over the years Fox Metro has relied heavily upon working with and making recommendations based upon analytical data that is, preferably, both as accurate and reliable as possible. With this understanding in mind, Fox Metro supports the Illinois Environmental Protection Agency (Agency) proposal to amend 35 Ill. Adm. Code 304.120 by adding a Paragraph (g) which specifies that the five (5) day carbonaceous biochemical oxygen demand (CBOD₅) test is the analytical method to be used for the measurement of biochemical oxygen demand in wastewater effluents.

The Agency proposal is significant because it eliminates the ambiguity whereby a potentially less reliable test, the five (5) day biochemical oxygen demand (BOD₅), might be used to measure the above referenced and important parameter of wastewater treatment plant performance. Agency testimony, previously submitted January 29, 2002, has detailed how ammonia nitrogen can be a potential interference in the BOD₅ test. Interferences in test methods can lead to inconsistent, inaccurate and/or unreliable results. The CBOD₅ test eliminates the potential interference by ammonia nitrogen and leads to more reliable data upon which wastewater treatment plant design, performance evaluation and process control decisions can more confidently be made.

The argument that the effluent discharge limits for biochemical oxygen demand should be lowered if the CBOD₅ test is specified for its measurement is inconsistent with reason. This argument is seemingly based upon the assumption that ammonia nitrogen was meant or implied to be measured as part of the BOD₅ test. If this were true, then it would also stand to reason that there is no need to test or have discharge limits for ammonia nitrogen as that parameter would already be accounted for in the BOD₅ test! This, of course, is unreasonable.

For many years now, water quality business professionals have been using CBOD₅ data upon which to design wastewater treatment plants, analyze their performance and make process control decisions. Now is the time to officially recognize what has been "professionally understood" for all these years, that the CBOD₅ test be the specified method for measuring the biochemical oxygen demand in wastewater treatment plant effluents, and that the existing discharge limits for this parameter should remain unchanged.

Sincerely,

Thomas F. Muth
District Manager
Fox Metro Water Reclamation District