



GLENBARD WASTEWATER AUTHORITY

21 W. 551 Bemis Road
Glen Ellyn, Illinois 60137
(630) 790-1901 • Fax: (630) 858-8119

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STATE OF ILLINOIS
Pollution Control Board

February 28, 2002

Illinois Pollution Control Board
Attn: Dorothy Gunn, Clerk; Re: Docket RO2-11
James R. Thompson Center 100 West Randolph Street
Suite 11-500
Chicago, IL 60601

f.c. #11

Dear Ms. Gunn:

On behalf of the Glenbard Wastewater Authority, I would like to offer the following comments in support of the proposed amendment to 35 Ill. Adm. Code 304.120 intended to clarify the confusion concerning the existing BOD term in the regulations.

The purpose of secondary treatment for wastewater treatment plants is to remove suspended solids and biodegradable matter (carbonaceous material) from wastewater to a specified level of quality. The USEPA originally required that the secondary treatment process efficiency be measured in total BOD (BOD₅) but subsequently, during 1984, authorized the use of carbonaceous BOD (CBOD) for determination of that efficiency. This authorization was largely predicated upon the fact that the interference of nitrogenous oxygen demand (NOD) interfered with the universal application of the BOD₅ test as a comparative measure of secondary treatment process efficiency. Depending on a variety of circumstances regarding the wastewater sample and treatment plant operations, this interference can result in BOD₅ test results that do not accurately reflect the true efficiency of the secondary treatment process. This revelation led to the development of the 5-day carbonaceous biochemical oxygen demand (CBOD₅) test, a procedure which allows the oxygen demand due to carbonaceous material to be separated from the oxygen demand resulting from ammonia-nitrogen.

The IEPA began including CBOD as the effluent limit in NPDES permits since the EPA's authorization of the same measure during 1984 and has continued that practice ever since. The referenced issue before the Board is not intended to extend relief to dischargers from the standpoint of a relaxed discharge standard. Clearly, the purpose is to eliminate the ambiguity associated with the existing regulation terminology. By formally recognizing use of the CBOD₅ test for measuring deoxygenating wastes, the Board will merely be acknowledging the generally accepted theories and practices in our industry for assessing the removal of organic matter in the secondary treatment practice.

Sincerely,

William E. Kuzia, P.E.
Utilities Manager