

ORIGINAL

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February 28, 2002

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STATE OF ILLINOIS
Pollution Control Board

P.C.#3

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

Re: Docket R02-11

The Wheaton Sanitary District would like to comment on the proposed amendments to 35 Ill. Adm. Code 304.120, currently before the Board under this Docket R02-11.

The District is specifically concerned over the issue that has been raised regarding the proposed change from five-day biochemical oxygen demand (BOD₅) to five-day carbonaceous biochemical oxygen demand (CBOD₅).

The District's NPDES Permit No. IL0031739 has required reporting effluent CBOD₅ since 1988.

As the members of the Board are well aware, the CBOD₅ test eliminates the effect of the nitrogenous oxygen demand. This is a highly variable quantity depending on the extent to which nitrification has occurred in the sample being tested. The CBOD₅ test has historically been used to measure the removal of organic matter in the treatment process and was never intended to control downstream dissolved oxygen, as is apparently the objective of those who oppose this change. Numerous references can be cited in the literature of the need to inhibit nitrification in the BOD₅ analysis to obtain data that can be used to compare results on different samples.

In any event, the use of BOD₅ would not be meaningful since, in some cases, it could include none of the nitrogenous demand and, in other cases, include a significant fraction of the nitrogenous demand, or anywhere in between. What value is this highly variable parameter in determining the dissolved oxygen effects from a plant effluent?

The Board's rules already contain standards for ammonia-nitrogen, to control toxicity in a water body, and dissolved oxygen. If toxicity or low dissolved oxygen is a concern, these are the proper parameters to be used to insure that water quality is maintained.

The District supports the amendment to the rules as proposed by the Illinois Environmental Protection Agency.

We appreciate the opportunity to provide our comments.

WHEATON SANITARY DISTRICT



Robert L. Clavel, P.E.
Engineer - Manager