

JONES, DAY, REAVTS & POGUE

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DEC - 4 2001

STATE OF ILLINOIS
Pollution Control Board

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JP410531:tw
083264-034010

December 3, 2001

Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center
Suite 11-500
Chicago, Illinois 60601-3218

Re: Consumers Illinois Water Company's Statement
In Support of Requested Relief in Docket No. AS01-9
Petition of Rhodia, Inc. and Thorn Creek Basin Sanitary District

Dear Clerk:

An original and nine duplicate copies of a statement in support of requested relief are enclosed for filing in the referenced matter. An additional copy is enclosed for you to file stamp and return to me in the enclosed self-addressed stamped envelope. Please call me if you have any questions. Thanks for your assistance.

Sincerely,



Charles T. Wehland

Enclosures

cc: Boyd J. Springer

CH-1194711v1

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*AN ASSOCIATE FIRM

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STATE OF ILLINOIS
Pollution Control Board

**BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

IN THE MATTER OF:)
)
Petition of RHODIA, INC. and THORN CREEK) **AS01-9**
BASIN SANITARY DISTRICT for an Adjusted) (Adjusted Standard - Water)
Standard from 35 Ill. Adm. Code)
302.208 and 304.105)

**CONSUMERS ILLINOIS WATER COMPANY'S
STATEMENT IN SUPPORT OF REQUESTED RELIEF**

Consumers Illinois Water Company (CIWC) believes that the relief requested by Rhodia, Inc. and Thorn Creek Basin Sanitary District (Petitioners) in this proceeding should be granted. Petitioners are requesting an adjusted water quality standard for dissolved solids and sulfates in portions of Thorn Creek and the Little Calumet River. CIWC operates a wastewater treatment facility which discharges to Deer Creek. Deer Creek joins Thorn Creek downstream of Petitioners' proposed discharge.

CIWC operates pursuant to an adjusted standard (AS 89-3) for dissolved solids in Deer Creek and portions of Thorn Creek. The Petitioners have requested relief that raises the allowable concentration of dissolved solids in Thorn Creek. The requested relief is consistent with current and projected future discharges to Deer Creek by CIWC. The concentration modeling used to support the petition is conservative. As a result, it accommodates projected future growth of the Deer Creek discharge.

Based on preliminary discussions with industrial users, the discharges to Deer Creek could have higher concentrations of dissolved solids and sulfates in the future. Many of the possible scenarios would not require any further change to the adjusted standard requested by the Petitioners. Of course, CIWC may need to seek adjustment of the standards for Deer Creek in a separate proceeding if the projected changes to the Deer Creek discharge become a reality.

In the meantime, CIWC believes the relief requested by the Petitioners should be granted.

It is necessary for the proposed discharge by the Petitioners and it accommodates potential future growth of the CIWC discharge on Deer Creek.

Respectfully Submitted,



Charles T. Wehland

Boyd J. Springer

JONES, DAY, REAVIS & POGUE

77 West Wacker Drive

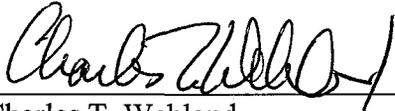
Chicago, IL 60601-1692

(312) 782-3939

Attorneys For Consumers Illinois Water Company

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached Consumers Illinois Water Company's Statement in Support of Requested Relief, by first class, U.S. Mail, postage prepaid, on December 3, 2001.



Charles T. Wehland

SERVICE LIST:

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Basin Sanitary District

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