

ILLINOIS POLLUTION CONTROL BOARD
August 9, 1990

IN THE MATTER OF)
)
PETITION OF THE CITY OF) AS 90-1
JACKSONVILLE FOR ADJUSTED) (Adjusted Standard)
STANDARD FROM 35 ILL. ADM.)
CODE SECTION 306.305(b))

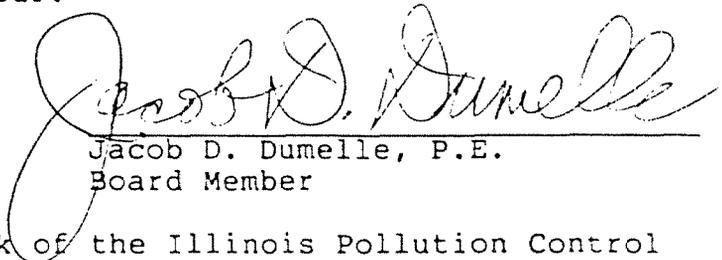
CONCURRING OPINION:

There are three concerns with this proceeding. First, neither the IEPA nor Jacksonville discuss possible alternatives to chlorination such as ozonation or ultra-violet radiation. These latter processes leave no chlorine residual, of course. The December, 1987 report from the Illinois Department of Energy and Natural Resources titled "Assessment of Wastewater Disinfection Technologies and Regulatory Strategies" is a good source for information about these non-chlorine disinfection alternatives.

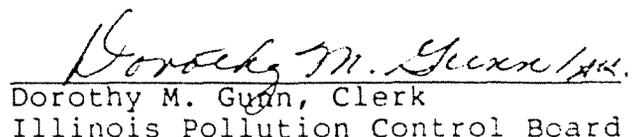
Second, the IEPA Response filed March 13, 1990 agrees with Jacksonville that chlorination of flows after the first flush "is a technologically infeasible method to accomplish disinfection". This statement, which is brief and not referenced to any special circumstances seems to also attack the general rule, namely Section 306.305(d). Perhaps Jacksonville has some unusual circumstances that are not mentioned. But how is one to square IEPA's agreement here to not disinfect with the general rule absent knowing these special circumstances?

Third, the IEPA mentions "substantial primary contact uses in certain areas on Mauvaise Terre Creek". What if a rainstorm occurs just upon Jacksonville? Might not swimming occur downstream in the Creek in waters polluted with undisinfected sewage from the combined sewer overflows? The point is that a waterborne disease hazard exists in the granting of this adjusted standard.

For these reasons, I concur.


Jacob D. Dumelle, P.E.
Board Member

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board hereby certify that the above Concurring Opinion was submitted on the 24th day of August, 1990.


Dorothy M. Gunn, Clerk
Illinois Pollution Control Board