

ILLINOIS POLLUTION CONTROL BOARD

May 26, 1971

In the Matter of

)
Revision of Public Water)
Supply and Food Processing)
Water Supply Use Standard)

#R71-11

)
Opinion of the Board (by Mr. Dumelle)

On March 17, 1971 the Board authorized for hearings a proposal to amend the water quality standards for public water supply and food processing water supply use. The amendment, requested by the Federal Environmental Protection Agency, is as follows:

Amend SWB-7 as follows:

Waters designated for public and food processing water supply use shall be of such quality that with treatment consisting of coagulation, sedimentation, filtration, storage and chlorination, or other equivalent treatment processes, the treated water shall meet in all respects both the mandatory and recommended requirements of the Public Health Service Drinking Standards - 1962 for finished water.

Hearings were held on the proposal in Chicago and Danville on May 18, 1971 and May 19, 1971 respectively.

Witness Phillip Reed of the Chicago Water Bureau endorsed the proposal and characterized it as an "insurance policy" to be used together with specific numeric criteria (R. 18).

Mr. Donald Maddox of the Federal Environmental Protection Agency called the amendment an improvement over existing Illinois standards because, with the exception of SWB-7, the present rules do not state the degree of water treatment which must be provided (R. 21). As is the case with waste treatment, water treatment can purify almost any source if cost is not an object. The purpose of this revision is to ensure that those who treat water for domestic or food processing purposes shall not have to use extraordinary techniques to reclaim polluted water.

Mr. Leo Michl, Jr. of the Macon County Health Department raised the question whether Decatur would be in violation of this proposed standard if its water supply were high in nitrates as has happened in the past (R. 73-83). This standard, now enacted, is an "umbrella" type regulation to protect users of waters designated for water supply or food processing from dischargers who might make difficult the use of the listed water treatment processes. Put another way, unless Decatur itself were discharging nitrates into its water supply, the legal action, if any, would be directed against identifiable sources of nitrates and not against Decatur.

The Illinois Environmental Protection Agency endorsed the revision and found it "consistent with the intent of existing water quality standards and effluent criteria that stream water be of such quality so as to be available for all its designated water uses" (Blomgren, R. 59). Mr. Blomgren suggested substituting the phrase "following conventional treatments" for the listing of specific processes contained in the original proposal. However, he admits this would leave the interpretation of the word "conventional" up to the Agency (R. 64-5).

We feel that to leave the term "conventional" undefined might result in processes which are presently used only because of pollution problems, such as the use of activated carbon to counter taste and odor problems, being designated as conventional. The language of the original proposal is more specific and should be used.

The Illinois EPA also recommended substituting the phrase "Current Drinking Water Standards" for the specific 1962 reference (R.62). We will not do that because the Board cannot delegate its responsibilities for setting standards to another agency. If the Federal Environmental Protection Agency adopts new Drinking Water Standards it will be a simple matter to reconsider and update this standard at that time.

Accordingly, we have adopted the public and food processing water supply revision as originally proposed on March 17, 1971.

I, Regina E. Ryan, Clerk of the Illinois Pollution Control Board, hereby certify that the above Opinion was entered on the 26 day of May, 1971.

A handwritten signature in cursive script, reading "Regina E. Ryan". The signature is written in dark ink on a white background.