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MAY 17 2002
STATE OF ILLINOIS
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PROPOSED AMENDMENTS TO AMMONIA) R02-19
NITROGEN STANDARDS 35 Ill. Adm. Code)
302.212, 302.213, and 304.122)

NOTICE OF FILING

P. C. #4

Please see attached Service List

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the **POST-HEARING COMMENTS** of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

ENVIRONMENTAL PROTECTION AGENCY
OF THE STATE OF ILLINOIS

By: *Deborah J. Williams*
Deborah J. Williams
Assistant Counsel
Division of Legal Counsel

DATED: May 15, 2002

Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
(217) 782-5544

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PROPOSED AMENDMENTS TO
AMMONIA NITROGEN STANDARDS
35 ILL. ADM. CODE 302.212, 302.213,
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R 02-19
(Rulemaking-Water)

STATE OF ILLINOIS
Pollution Control Board

**POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY**

NOW COMES the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), by its attorney, Deborah J. Williams, and hereby submits comments in the above rulemaking proceeding.

The Illinois EPA appreciates the Illinois Pollution Control Board's ("Board") efforts in this rulemaking to amend the ammonia nitrogen water quality standard and welcomes the opportunity to make these comments. The Illinois EPA believes the proposed amendments submitted by Illinois Association of Wastewater Agencies ("IAWA") will meet federal requirements and will continue to assure protection of the water resources of the State of Illinois, while recognizing the need for continued development and utilization of these resources.

IAWA'S AMENDED PROPOSAL

The Illinois EPA submitted pre-filed testimony of Robert Mosher in this matter on March 1, 2002. Mr. Mosher's testimony was entered as Exhibit 9 at the March 25, 2002 Chicago hearing. In this pre-filed testimony, the Illinois EPA suggested several changes to IAWA's original regulatory proposal. On April 3, 2002, IAWA filed an amended rulemaking proposal which incorporated all of the changes suggested by the Illinois EPA. In addition, IAWA attempted to address the issues raised by the Board at the

March 25th hearing. The Illinois EPA agrees with all of the changes contained in IAWA's amended rulemaking proposal and believes they adequately address the issues raised by the Board while remaining consistent with the federal National Criteria Document, the Board's existing regulatory structure and the programmatic needs of the Illinois EPA. The specific changes made by IAWA in response to the Board's comments were changing the term Summer and Winter to Early Life Stages Present and Early Life Stages Absent, adding the term water before the word temperature in several places, adding a definition of the term early life stage and changing the method for evaluating attainment of the sub-chronic water quality standard to require that the four samples utilized must be taken on four consecutive days. The Illinois EPA agrees with IAWA's conclusion that inclusion of the term indigenous is not necessary based on the testimony presented by IAWA's witness Mr. Robert J. Sheehan and the Illinois EPA's internal review.

TYPOGRAPHICAL SUGGESTIONS

Although the Illinois EPA is in agreement with the substance of IAWA's amended proposal, the Agency would like to point out a few minor typographical issues for the Board's consideration in drafting a first notice order. IAWA does not add the term "water" before the word temperature in a few places in the amended proposal. These occur in the equations found in Section 302.212(b)(2)(A) and (B). The Board may want to considering adding the term "water" before "temperature" in these two places also.

In the equations found in Section 302.212(b)(2), placement of the phrase "Where T = Temperature, degrees Celsius" is not consistent. In Section 302.212(b)(2)(A)(ii), the phrase appears after the equation, while it appears before the equation in Section

302.212(b)(2)(B)(ii). The Board may want to consider achieving consistency between the two sections by changing the equation in Section 302.212(b)(2)(B) to match the equation in Section 302.212(b)(2)(A).

In Table C-2 of IAWA's amended proposal, titled *Temperature and pH-Dependent Values of the CCC (Chronic Criterion) for Fish Early Life Stages Absent*, there are five instances where it appears that the ammonia values have been rounded to one decimal point and reported with two decimal points. For the values with a pH of 6 and temperatures of 12, 13, 14, 15 and 16, the ammonia values should be 8.17, 7.66, 7.19, 6.74 and 6.32 respectively instead of 8.20, 7.70, 7.20, 6.70 and 6.30 as reported.

Responses to questions raised at the March 25 and April 23 hearings

Though the Illinois EPA responded to most issues raised at the first and second hearings in this matter on the record during those proceedings, a few outstanding issues remain to be addressed in these post-hearing comments.

Environmental Impact and Alternatives

At the first hearing in this proceeding, a question was raised by Albert Ettinger regarding whether the new ammonia water quality standard proposed by IAWA would be a relaxation of the current standard in all circumstances. Specifically, Mr. Ettinger asked Mr. Sheehan: "Is there anywhere in this proposal in terms of the formulas that come out of this proposal in which you would actually wind up with a stricter ammonia standard . . . under the proposed rule than under the existing rules?" Transcript of Chicago hearing at 135. Mr. Sheehan did not know the answer to this question. The Illinois EPA has looked at that question and provided a Table for the Board which demonstrates those pH and temperature values that would result in less stringent water

quality standards under the proposal and those pH and temperature values that would result in stricter water quality standards under the proposal. See Exhibit A. Although for most common pH and temperature values, the equations result in higher water quality standard values under the proposal; for those values above the dark line in Exhibit A, the new standard would result in stricter water quality standard values.

At the Chicago hearing, testimony was presented from by David Zenz of Consoer Townsend Envirodyne Engineers, Inc. regarding a conversation between Mr. Zenz, Mike Zima of DeKalb Sanitary District and Al Keller of the Illinois EPA regarding the use of breakpoint chlorination as an alternative treatment technology for ammonia nitrogen. (Transcript at p. 80-81). IAWA testified that during that conference call with Al Keller, he indicated that the Illinois EPA would not accept use of the breakpoint chlorination alternative for treating ammonia. IAWA also testified that Al Keller would be sending a letter to that effect to them. The hearing officer requested that a copy of the letter from the Illinois EPA to DeKalb Sanitary District confirming the Illinois EPA's position on use of that technology be submitted into the record of this proceeding. A letter such as that described by IAWA was sent by the Illinois EPA to Mr. Zenz on March 26, 2002. A copy of that letter has been attached to these post-hearing comments as Exhibit B.

Submittal of Typical pH data

At the Springfield hearing, Anand Rao of the Board's technical staff requested that the Illinois EPA submit a general range of typical pH values for some major Illinois streams. Attached to these comments as Exhibit C are the pH data for six Illinois streams covering the period January 1997 to December 2001. The Exhibit also

provides the high, average, low, 50th percentile, 75th percentile and standard deviation of the pH values for this time period.

Implementation Issues

At both the first and second hearings the Board raised concerns about whether the proposal adequately established a sub-chronic water quality standard that would address what the Board termed the “highest four day average within the thirty day period” concept of the National Criteria Document. Transcript of Springfield hearing at 32. IAWA made changes to its initial proposal in an attempt to address this issue. The Illinois EPA supports the changes proposed by IAWA as the best way to ensure that the National Criteria Document’s intent to establish distinct four day and thirty day chronic toxicity standards is implemented. In addition, this language establishes water quality standards whose attainment can be assessed with the available or obtainable monitoring data.

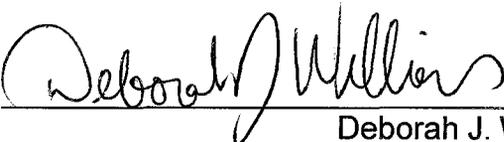
At both hearings the Board questioned whether there was a need for an effluent limit on ammonia dischargers under Part 304 of the Board’s rules and whether Section 355.203(a) of the Agency’s existing procedural rules represents an effluent limit that should be placed in Part 304. At the first and second hearings, the Illinois EPA explained that Section 355.203(a) is not expected to change following amendments to the water quality standard proposed in this rulemaking docket; that it is intended as a procedure for setting water quality based permit limits that contain an adequate safety factor to prevent violations of the Board’s water quality standards for ammonia; that this provision is not intended to function as either a water quality standard or technology based effluent limit; and that this provision was adopted after extensive negotiations

between Region V of the United States Environmental Protection Agency, environmental groups and the regulated community. Though the Board is free to develop an administrative record for establishment of a technology based effluent limit applicable to all ammonia dischargers, the Illinois EPA does not believe such a provision is a necessary component of this rulemaking docket.

Conclusion

The Illinois EPA thanks the Board for the opportunity to participate in this rulemaking proceeding and encourages the Board to proceed expeditiously towards the adoption of a first notice opinion and order revising the ammonia nitrogen water quality standards.

Respectfully submitted,

By: 
Deborah J. Williams
Assistant Counsel
Division of Legal Counsel

Dated: May 15, 2002

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

Exhibit A



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

217/782-0610

March 26, 2002

David R. Zenz, Ph.D., P.E.
Senior Associate
CTE Engineers
300 East Wacker Drive
Suite 600
Chicago, IL 60601-5276

Re: DeKalb Sanitary District Ammonia Reduction Using Breakpoint Chlorination

Dear Mr. Zenz:

The Agency received your letter dated January 28, 2002 concerning a request to use breakpoint chlorination at DeKalb Sanitary District's sewage treatment plant (STP). As discussed by phone March 19, 2002, the Agency will not approve the proposed use of breakpoint chlorination to reduce ammonia from the wastewater treatment plant effluent. As we discussed in the teleconference the Agency's main concern was with the formation of chlorinated organic compounds. We also discussed the existing STP flows, the STP schematic, the use of only one year of flow data and future STP expansion. The Agency believes biological treatment is the best solution for removing ammonia in effluents.

The Agency appreciates your correspondence and will continue to work with DeKalb Sanitary District to address the compliance schedule in their NPDES Permit requiring them to meet the stated ammonia limits by December 2003.

Should you have any questions or comments regarding the above, please contact Gary Bingenheimer at the indicated telephone number and address.

Sincerely,

Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

TGM:GWB:l:\users\epa1175\letters\dekalb

cc: Records Unit
Rockford FOS
Michael Zima - DeKalb Sanitary District

GEORGE H. RYAN, GOVERNOR

Exhibit B

Winter (Chronic)

Temp/pH	6.9	7.0	7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8	7.9	8.0	8.1	8.2	8.3	8.4	8.5
4.0	25.9	20.6	16.3	13.0	10.3	8.2	6.5	5.2	4.1	3.3	2.6	2.1	1.7	1.3	1.1	0.8	0.7
5.0	23.9	19.0	15.1	12.0	9.5	7.6	6.0	4.8	3.8	3.0	2.4	1.9	1.5	1.2	1.0	0.8	0.6
6.0	22.0	17.5	13.9	11.0	8.8	7.0	5.5	4.4	3.5	2.8	2.2	1.8	1.4	1.1	0.9	0.7	0.6
7.0	20.3	16.1	12.8	10.2	8.1	6.4	5.1	4.1	3.2	2.6	2.1	1.6	1.3	1.0	0.8	0.7	0.5
8.0	18.8	14.9	11.8	9.4	7.5	5.9	4.7	3.8	3.0	2.4	1.9	1.5	1.2	1.0	0.8	0.6	0.5
9.0	17.3	13.8	10.9	8.7	6.9	5.5	4.4	3.5	2.8	2.2	1.8	1.4	1.1	0.9	0.7	0.6	0.5
10.0	16.0	12.7	10.1	8.0	6.4	5.1	4.0	3.2	2.6	2.0	1.6	1.3	1.0	0.8	0.7	0.5	0.4

Winter (Acute)

Temp/pH	6.9	7.0	7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8	7.9	8.0	8.1	8.2	8.3	8.4	8.5
4	145.0	115.2	91.5	72.7	57.8	45.9	36.5	29.0	23.1	18.4	14.6	11.6	9.3	7.4	5.9	4.7	3.8
5	133.7	106.2	84.4	67.1	53.3	42.4	33.7	26.8	21.3	16.9	13.5	10.7	8.6	6.8	5.5	4.4	3.5
6	123.3	98.0	77.8	61.9	49.2	39.1	31.1	24.7	19.7	15.6	12.5	9.9	7.9	6.3	5.0	4.0	3.2
7	113.8	90.4	71.8	57.1	45.4	36.1	28.7	22.8	18.1	14.4	11.5	9.2	7.3	5.8	4.7	3.7	3.0
8	105.1	83.5	66.3	52.7	41.9	33.3	26.5	21.1	16.8	13.3	10.6	8.5	6.8	5.4	4.3	3.5	2.8
9	97.1	77.1	61.3	48.7	38.7	30.8	24.5	19.5	15.5	12.3	9.8	7.8	6.3	5.0	4.0	3.2	2.6
10	89.7	71.3	56.7	45.0	35.8	28.5	22.6	18.0	14.3	11.4	9.1	7.3	5.8	4.6	3.7	3.0	2.4

Summer (Chronic)

Temp/pH	6.9	7.0	7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8	7.9	8.0	8.1	8.2	8.3	8.4	8.5
18	19.9	15.8	12.6	10.0	7.9	6.3	5.0	4.0	3.2	2.6	2.0	1.6	1.3	1.1	0.8	0.7	0.6
19	18.5	14.7	11.7	9.3	7.4	5.9	4.7	3.7	3.0	2.4	1.9	1.5	1.2	1.0	0.8	0.6	0.5
20	17.2	13.6	10.8	8.6	6.9	5.5	4.4	3.5	2.8	2.2	1.8	1.4	1.1	0.9	0.7	0.6	0.5
21	16.0	12.7	10.1	8.0	6.4	5.1	4.1	3.2	2.6	2.1	1.6	1.3	1.1	0.9	0.7	0.6	0.5
22	14.8	11.8	9.4	7.5	5.9	4.7	3.8	3.0	2.4	1.9	1.5	1.2	1.0	0.8	0.6	0.5	0.4
23	13.8	11.0	8.7	7.0	5.5	4.4	3.5	2.8	2.2	1.8	1.4	1.2	0.9	0.7	0.6	0.5	0.4
24	12.9	10.2	8.1	6.5	5.2	4.1	3.3	2.6	2.1	1.7	1.3	1.1	0.9	0.7	0.6	0.5	0.4
25	12.0	9.5	7.6	6.0	4.8	3.8	3.1	2.4	1.9	1.6	1.3	1.0	0.8	0.7	0.5	0.4	0.4
26	11.2	8.9	7.1	5.6	4.5	3.6	2.9	2.3	1.8	1.5	1.2	0.9	0.8	0.6	0.5	0.4	0.3
27	10.4	8.3	6.6	5.3	4.2	3.3	2.7	2.1	1.7	1.4	1.1	0.9	0.7	0.6	0.5	0.4	0.3
28	9.7	7.7	6.2	4.9	3.9	3.1	2.5	2.0	1.6	1.3	1.0	0.8	0.7	0.5	0.4	0.4	0.3

Summer (Acute)

Temp/pH	6.9	7.0	7.1	7.2	7.3	7.4	7.5	7.6	7.7	7.8	7.9	8.0	8.1	8.2	8.3	8.4	8.5
18	115.1	91.5	72.7	57.8	46.0	36.6	29.2	23.2	18.5	14.8	11.8	9.4	7.6	6.1	4.9	4.0	3.2
19	106.9	85.0	67.6	53.7	42.8	34.0	27.1	21.6	17.2	13.7	11.0	8.8	7.1	5.7	4.6	3.7	3.0
20	99.4	79.0	62.8	50.0	39.8	31.6	25.2	20.1	16.0	12.8	10.2	8.2	6.6	5.3	4.3	3.5	2.8
21	92.4	73.5	58.4	46.5	37.0	29.4	23.5	18.7	14.9	11.9	9.5	7.6	6.1	4.9	4.0	3.2	2.6
22	86.0	68.4	54.4	43.3	34.4	27.4	21.8	17.4	13.9	11.1	8.9	7.1	5.7	4.6	3.7	3.0	2.5
23	80.0	63.6	50.6	40.3	32.1	25.5	20.3	16.2	13.0	10.4	8.3	6.7	5.4	4.3	3.5	2.9	2.3
24	74.5	59.3	47.1	37.5	29.9	23.8	19.0	15.1	12.1	9.7	7.8	6.2	5.0	4.0	3.3	2.7	2.2
25	69.5	55.2	43.9	35.0	27.8	22.2	17.7	14.1	11.3	9.0	7.2	5.8	4.7	3.8	3.1	2.5	2.1
26	64.7	51.5	41.0	32.6	26.0	20.7	16.5	13.2	10.5	8.4	6.8	5.4	4.4	3.6	2.9	2.4	1.9
27	60.4	48.0	38.2	30.4	24.2	19.3	15.4	12.3	9.8	7.9	6.3	5.1	4.1	3.3	2.7	2.2	1.8
28	56.4	44.8	35.7	28.4	22.6	18.0	14.4	11.5	9.2	7.4	5.9	4.8	3.9	3.1	2.6	2.1	1.7

To the right and below the darkened line, the new WQS is less restrictive.
 To the left and above the darkened line, the new WQS is more restrictive.

Exhibit C

Sample Date	pH		Average	Low	50th Percentile		Standard
	Result	High			Median	75th Percentile	
D-23, ILLINOIS RIVER AT MARSEILLES, IL							
03/11/97	7.59						
04/15/97	7.67						
05/19/97	7.90						
07/14/97	8.06						
09/08/97	8.06						
11/04/97	7.55						
12/16/97	7.72						
01/29/98	7.75						
03/12/98	7.64						
04/07/98	7.64						
05/04/98	7.74						
06/22/98	7.75						
07/20/98	8.50						
09/21/98	7.64						
11/17/98	7.64						
12/15/98	7.74						
04/26/99	7.15						
05/24/99	7.43						
06/28/99	7.65						
08/25/99	7.83						
09/27/99	7.80						
12/07/99	7.29						
03/13/00	7.82						
04/24/00	7.40						
05/22/00	7.31						
06/29/00	7.72						
08/08/00	8.19						
03/14/01	7.96						
04/10/01	8.10						
04/30/01	7.34						
05/23/01	7.91						
06/28/01	8.36						
07/26/01	7.63						
09/06/01	8.16						
10/18/01	7.44	8.50	7.75	7.15	7.72	7.91	0.30

Sample Date	pH		Average	Low	50th Percentile Median	75th Percentile	Standard Deviation
	Result Value	High					
DT-09, FOX RIVER AT SOUTH ELGIN, IL							
01/07/97	8.17						
02/18/97	8.12						
03/26/97	8.55						
05/28/97	8.60						
07/11/97	8.54						
09/04/97	8.19						
11/06/97	7.73						
12/17/97	8.27						
02/04/98	8.07						
03/17/98	8.36						
04/09/98	7.78						
06/01/98	8.70						
07/06/98	8.98						
08/10/98	8.63						
09/15/98	7.64						
11/12/98	8.37						
11/12/98	8.37						
12/07/98	8.83						
12/07/98	8.83						
03/18/99	8.49						
04/13/99	8.43						
05/27/99	8.46						
06/25/99	8.23						
08/24/99	7.99						
08/24/99	7.99						
09/21/99	8.78						
09/21/99	8.78						
10/21/99	8.25						
10/21/99	8.25						
12/02/99	8.23						
12/02/99	8.23						
01/05/00	8.50						
02/15/00	7.84						
03/16/00	8.48						
04/24/00	8.34						
04/24/00	8.34						
06/05/00	7.88						
06/12/00	8.02						
07/06/00	8.05						
07/06/00	8.05						
07/06/00	8.05						
07/10/00	8.06						
07/18/00	8.38						
07/31/00	8.02						
08/21/00	8.49						
09/05/00	8.12						
09/11/00	8.13						
09/18/00	8.44						

Sample Date	pH Result Value	High	Average	Low	50th Percentile Median	75th Percentile	Standard Deviation
09/25/00	7.89						
09/29/00	8.18						
09/29/00	8.20						
09/29/00	8.20						
11/14/00	8.61						
01/10/01	7.97						
03/07/01	7.97						
03/07/01	7.97						
04/04/01	8.74						
04/04/01	8.74						
04/27/01	8.74						
06/04/01	8.18						
08/10/01	8.50						
09/25/01	8.15						
11/06/01	8.46						
12/26/01	8.23	8.98	8.29	7.64	8.24	8.49	0.30115

Sample Date	pH			50th Percentile Median	75th Percentile	Standard Deviation	
	Result Value	High	Average Low				
E-26, SANGAMON RIVER AT RIVERTON, IL							
01/02/97	7.90						
02/11/97	7.40						
03/11/97	7.90						
04/28/97	7.90						
07/08/97	8.00						
08/25/97	7.80						
09/16/97	7.80						
10/07/97	8.00						
11/06/97	7.50						
12/29/97	8.20						
02/18/98	7.90						
03/24/98	7.30						
05/05/98	7.90						
06/02/98	7.70						
08/11/98	7.71						
09/09/98	8.30						
10/28/98	7.80						
12/02/98	7.60						
01/27/99	7.50						
03/01/99	7.30						
04/06/99	7.80						
05/13/99	7.60						
06/14/99	7.30						
08/09/99	8.21						
09/14/99	7.70						
10/28/99	7.60						
11/29/99	7.96						
12/27/99	8.17						
02/07/00	8.35						
03/23/00	8.04						
05/25/00	7.90						
08/14/00	8.51						
09/11/00	7.84						
10/11/00	6.96						
12/11/00	8.21						
01/11/01	7.59						
02/26/01	7.32						
03/27/01	8.02						
04/24/01	7.59						
05/23/01	7.70						
07/18/01	7.93						
08/09/01	8.26						
10/22/01	7.80						
11/26/01	7.67	8.51	7.81	6.96	7.80	8.00	0.32275

Sample Date	pH			50th Percentile Median	75th Percentile	Standard Deviation	
	Result Value	High	Average Low				
G-22, DES PLAINES RIVER NEAR DES PLAINES, IL							
01/27/97	7.45						
03/05/97	7.93						
04/29/97	8.16						
06/02/97	8.09						
06/17/97	7.82						
08/14/97	7.90						
09/30/97	7.91						
11/05/97	7.97						
12/08/97	7.88						
02/03/98	7.75						
03/03/98	7.91						
04/15/98	7.88						
05/29/98	7.92						
06/22/98	7.97						
08/05/98	7.81						
10/28/98	7.69						
12/01/98	6.54						
03/05/99	8.00						
04/01/99	8.04						
05/18/99	7.73						
06/22/99	7.72						
08/26/99	7.53						
09/30/99	7.67						
11/03/99	7.67						
12/16/99	7.72						
02/09/00	7.82						
03/01/00	7.58						
04/13/00	8.31						
05/18/00	7.58						
07/11/00	7.59						
08/10/00	8.00						
09/28/00	7.92						
03/19/01	7.85						
04/05/01	7.96						
05/02/01	7.87						
06/05/01	7.77						
07/25/01	7.59						
09/13/01	8.01						
11/08/01	7.57						
12/19/01	7.44	8.31	7.79	6.54	7.84	7.94	0.27973

Sample Date	pH			50th Percentile		Standard Deviation	
	Result Value	High	Average	Low	Median		75th Percentile
N-11, BIG MUDDY RIVER AT PLUMFIELD, IL							
02/05/97	6.60						
03/05/97	7.00						
04/02/97	7.30						
05/20/97	7.20						
06/10/97	7.20						
07/17/97	7.40						
08/21/97	7.40						
10/22/97	7.70						
12/03/97	7.40						
02/02/98	7.60						
03/04/98	7.90						
04/22/98	7.10						
05/21/98	7.30						
06/18/98	7.10						
07/22/98	6.70						
09/02/98	7.80						
10/14/98	6.90						
11/24/98	7.10						
01/06/99	7.20						
02/09/99	7.10						
03/23/99	7.60						
05/19/99	7.00						
07/07/99	6.60						
08/16/99	7.00						
09/14/99	7.10						
10/26/99	7.30						
12/07/99	7.00						
01/04/00	6.70						
02/16/00	6.80						
05/25/00	6.90						
06/20/00	6.80						
07/19/00	6.80						
09/06/00	6.50						
10/11/00	6.80						
12/07/00	7.10						
01/11/01	7.20						
02/07/01	7.30						
03/20/01	7.20						
05/01/01	7.10						
05/31/01	7.10						
07/16/01	6.90						
08/20/01	6.90						
10/17/01	6.70						
12/05/01	6.30	7.90	7.08	6.30	7.10	7.30	0.34096

	Sample Date	pH Result Value	High	Average	Low	50th Percentile Median	75th Percentile	Standard Deviation
P-06, ROCK RIVER AT COMO, IL								
	01/08/97	8.18						
	03/04/97	7.79						
	04/22/97	8.80						
	05/21/97	8.74						
	07/07/97	8.42						
	08/06/97	8.43						
	09/23/97	8.42						
	11/18/97	9.00						
	01/07/98	8.10						
	02/05/98	8.30						
	03/18/98	8.50						
	04/13/98	8.09						
	05/19/98	8.30						
	06/30/98	7.94						
	07/28/98	8.69						
	08/18/98	8.67						
	09/22/98	8.18						
	11/18/98	8.19						
	12/16/98	8.39						
	02/04/99	7.91						
	03/16/99	8.59						
	04/12/99	8.02						
	06/07/99	8.09						
	07/06/99	8.47						
	08/10/99	8.47						
	09/21/99	8.39						
	10/18/99	8.65						
	11/16/99	8.09						
	01/25/00	7.50						
	02/24/00	7.74						
	04/03/00	8.58						
	05/09/00	8.24						
	06/14/00	7.59						
	08/01/00	8.85						
	09/06/00	8.52						
	11/21/00	8.19						
	02/06/01	7.24						
	03/28/01	8.34						
	04/18/01	8.40						
	05/22/01	8.22						
	08/07/01	8.27						
	11/28/01	8.18	9.00	8.28	7.24	8.30	8.49	0.36497

STATE OF ILLINOIS

COUNTY OF SANGAMON

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PROOF OF SERVICE

I, the undersigned, on oath state that I have served the attached **POST-HEARING COMMENTS** of the Illinois Environmental Protection Agency upon the person to whom it is directed, by placing a copy in an envelope addressed to:

Please see attached service list.

and mailing it from Springfield, Illinois on **May 15, 2002** with sufficient postage affixed as indicated above.

Nancy J. D. Langost

SUBSCRIBED AND SWORN TO BEFORE ME

this 15th day of May 2002

Brenda Boehner
Notary Public



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R02-19
May 15, 2002

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