

ILLINOIS POLLUTION CONTROL BOARD  
January 27, 1983

ISP, INC., )  
 )  
 Petitioner, )  
 )  
 v. ) PCB 82-131  
 )  
 ILLINOIS ENVIRONMENTAL )  
 PROTECTION AGENCY, )  
 )  
 Respondent. )

SUPPLEMENTAL STATEMENT (By J.D. Dumelle):

The record as it relates to the efficiency of the existing treatment plant and any alternatives is deficient.

How can the efficiency of the aerated cell be - 66.8%? This means that 166.8% more BOD is discharged than is received. How can BOD be created if in fact the cell is aerated? Was this the result of high winds which stirred up bottom deposits which had a high BOD?

Secondly, the Illinois Environmental Protection Agency's (Agency) loading computations (the 22 lbs/ac./day standard, etc.) on the aerobic lagoons all assume a series feed. Why cannot the lagoons be operated in parallel? If this is done, the total acreage available rises from 41 to 81 and consequently the loadings per acre drop about 50%.

Lastly, if the natural aeration capability of the three aerated lagoons is in fact limited to 22 lbs/ac./day why cannot it be increased by adding mechanical aerators? Are the lagoons too shallow to do this? Or do they also function as final clarifiers?

If an extension is needed to the instant variance the above gaps in the record ought to be addressed. It also is not clear why 18 months is required to construct an oxidation ditch and an intra-channel clarifier. Why cannot these facilities be built in a single construction season during 1983?

A fuller explanation would have been of great help on all of these points.

  
Jacob D. Dumelle, P.E.  
Chairman

I, Christan L. Moffett, Clerk of the Illinois Pollution Control Board, hereby certify that the above Supplemental Statement was filed on the 27<sup>th</sup> day of September, 1982.

Christan L. Moffett  
Christan L. Moffett, Clerk  
Illinois Pollution Control Board