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STATE OF ILLINOIS
Pollution Control Board

Pre-filed Testimony of Albert Ettinger

I am Senior Staff Attorney at the Environmental Law & Policy Center of the Midwest and Water Issues Coordinator and General Counsel for the Illinois Chapter of the Sierra Club. I have worked in Illinois on matters relating to water pollution and implementation of the federal Clean Water Act since 1982. I am the primary drafter of the petition to amend the Part 309 Subpart A.

Earlier drafts of the petition were discussed with officials of Illinois EPA and members of various interest groups concerned with the NPDES permitting process. Various changes were made to the draft in response to views expressed in these discussions but no consensus was reached as to the proposal.

The proposal amends the most recent version of the rule as published on the Board's Web site.

I would be pleased to answer any questions by the Board or members of the public regarding the proposal, the reasons that it is being offered, or its expected effect.