



ORIGINAL
Rochelle Municipal Utilities

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STATE OF ILLINOIS
Pollution Control Board

P.C. #13

March 4, 2002

Illinois Pollution Control Board
Attention: Dorothy Gunn, Clerk
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: Docket R02-11

Dear Sirs:

The City of Rochelle supports Mr. Al Keller's testimony to recognize Carbonaceous Biochemical Oxygen Demand (CBOD) for effluent limits of NPDES permits issued in the State of Illinois.

The article, "Chemical method for nitrification control", Journal of Water Pollution Control, Volume 45, Number 4, April 1973, states that nitrification control should be adopted as a routine practice in the measurement of the BOD for all wastewaters. The work for this article was supported by an EPA grant. Depending upon the source material, the five-day time period for the BOD test was chosen either because it was developed in England, and it takes at most five days to reach the sea, or because nitrification does not occur until five days after the start of the BOD test. POTW's that are required to nitrify do have adequate numbers for nitrifying organisms resulting in the measurement of the nitrogenous and carbonaceous demand in the five-day BOD test for effluent waters.

The City of Rochelle has had an effluent ammonia limit since 1983, and was granted a permit modification in March 1987 that changed the BOD discharge limit of 10 mg/L to a CBOD limit of 10mg/L, monthly average. The revision was granted after submittal of one-year's data showing comparison of BOD and CBOD values of the discharge.

Sincerely,

Kathy Cooper

Kathy Cooper
Superintendent Water/Water Reclamation

cc: Ken Alberts, Director of Utilities