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December 6, 2004

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STATE OF ILLINOIS Pollution Control Board

PC#3C

Ms. Dorothy M. Gunn, Clerk Illinois Pollution Control Board James R. Thompson Center 100 West Randolph Street Suite 11-5000 Chicago, IL 60601

## RE: Docket No. R-04-021 Revisions to Radium Water Quality Standards

## Dear Ms. Gunn:

The Village of Sugar Grove, Kane County, Illinois owns and operates a Public Water Supply currently consisting of two deep sandstone wells (Wells No. 4 and 8), two shallow bedrock wells (Wells No. 5 and 6) and two shallow sand and gravel wells (Wells No. 2 and 7). The Village has recently completed the construction of another deep sandstone well (Well No. 9), but has not yet placed this well into service. Because of water quality and capacity issues, Wells No. 2, 4, 5 and 6 will be abandoned or placed on emergency stand-by status. Of the remaining wells, Wells No. 8 and 9 each exceed the current combined radium potable water standard of 5.0 pCi/l.

The Village of Sugar Grove has selected the cation exchange treatment process to remove the combined radium to below drinking water standards from Wells No. 8 and 9. Well No. 8 and the Well No. 8 Water Treatment Plant are in service while Well No. 9 and the Well No. 9 Water Treatment Plant are projected to be complete and in operation in the spring of 2005.

The cation exchange treatment process requires that the cations, including radium, removed from the water during treatment be discharged to the sanitary sewer system. The Village of Sugar Grove sanitary sewer system is serviced by the Fox Metro Water Reclamation District (FMWRD) Wastewater Treatment Facility (WWTF), Oswego, IL. Since FMWRD has a discharge to the Fox River and because the discharge has substantial dilution with the Fox River, it is not anticipated that there will be difficulty meeting the existing water quality standard of 1.0 pCi/l for radium 226. However, enforcement of the overly restrictive water quality standard could result in occasional violation and require additional expenditure of public funds without an associated benefit to the public or aquatic and riparian life associated with the stream.

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Therefore, the Village of Sugar Grove supports the approval of the proposal to implement revised water quality standards for radium concentrations in the receiving stream.

The Village of Sugar Grove appreciates the opportunity to provide comments to the Illinois Pollution Control Board on this important issue to our community.

Respectfully submitted,

sei Anthony Speciale

Director of Public Works Village of Sugar Grove

JWF/AS/tpf

pc: Mr. Sean Michels, Village President
Mr. Brent Eichelberger, Village Administrator
Atty. Steve Andersson, Village Attorney
Mr. Tom Muth, Fox Metro Water Reclamation District