



United City of Yorkville

County Seat of Kendall County

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STATE OF ILLINOIS
Pollution Control Board

December 8, 2004

PC#32

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:

On behalf of the United City of Yorkville, we are submitting this letter to summarize our support for the Illinois Environmental Protection Agency's (IEPA) proposed revisions to the Radium Water Quality Standard. Based on the background information, testimony, and written documentation provided to the Illinois Pollution Control Board (IPCB) on this topic, the United City of Yorkville believes the current standard is inappropriate. We also believe the proposed standard can be cost-effectively met, while keeping an appropriate level of environmental protection.

The United City of Yorkville, Kendall County, Illinois owns and operates a Public Water Supply currently consisting of four deep sandstone wells (Wells No. 3, 4, 8 and 9). The City has recently completed the construction of another deep sandstone well, Water Well No. 7, but has not yet placed this well into service. All of the deep sandstone wells exceed the current combined radium potable water standard of 5.0 pCi/l.

The United City of Yorkville has selected the cation exchange treatment process to remove the combined radium to below drinking water standards from Wells No. 3, 4, 7, 8 and 9. Wells No. 8 and 9 and the Well No. 8 and 9 Water Treatment Plant are in service while Well No. 7 and the Well No. 7 Water Treatment Plant are projected to be complete and in operation in February, 2005. The United City of Yorkville has entered into a Compliance Commitment Agreement with the Illinois Environmental Protection Agency requiring compliance with the radium standard for Wells No. 3 and 4. The construction of a Cation Exchange Treatment Facility for Wells No. 3 and 4 has been permitted by the IEPA and construction is expected to commence in the summer of 2005.

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The cation exchange treatment process requires that the cations, including radium, removed from the water during treatment be discharged to the sanitary sewer system. Portions of the United City of Yorkville sanitary sewer system are serviced by the Yorkville - Bristol Sanitary District (YBSD) Wastewater Treatment Facility (WWTF), Yorkville, IL, and other portions of the system are serviced by the Fox Metro Water Reclamation District (FMWRD) WWTF, Oswego, IL. Since YBSD and FMWRD both have 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 an 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.

Therefore, the United City of Yorkville supports the approval of the proposal to implement revised water quality standards for radium concentrations in the receiving stream. The United City of Yorkville appreciates the opportunity to provide comments to the Illinois Pollution Control Board on this important issue to our community.

Respectfully submitted,



Jeffrey W. Freeman, P.E.
Senior Project Manager
Engineering Enterprises, Inc



Tony Graff
City Administrator
United City of Yorkville

JWF/TG/tpf

pc: Mr. Arthur Prochaska, Jr. – Mayor
Mr. Joe Wywrot, P.E. – City Engineer
Mr. Eric Dhuse – Director of Public Works
Mr. Roy Harsch – Gardner, Carton, and Douglas
Mr. Ralph Pfister – YBSD
Mr. Tom Muth – FMWRD
JKM – EEI