

Village of
Romeoville
Community with Pride

RECEIVED
CLERK'S OFFICE

DEC 03 2004

STATE OF ILLINOIS
Pollution Control Board

Mayor
Fred P. Dewald

Trustees
Linda S. Palmiter
Edward "Doc" McCartan
Dennis Veselsky
Steve Spandonidis
Thomas Weinrick, Sr.
Marty Duffels

Clerk
Raymond E. Holloway

Director
Dan Bromberek

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

November 30, 2004

PC #13

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

Dear Ms. Gunn:

The Village of Romeoville provides potable water from twelve (12) fully operating wells, consisting of seven (7) shallow and five (5) deep, located throughout the Village's 30+ square mile Facilities Planning Area(FPA). We provide water to the residents of the Village of Romeoville (est. pop.33,000) and portions of Unincorporated Will County (est. pop. 13,000).

Romeoville has entered into a compliance commitment agreement with the Illinois Environmental Protection Agency requiring compliance with the maximum contaminant level for combined radium 226 and 228 by December 31, 2007. The Village has performed an extensive evaluation of all options and has chosen the co-precipitation of radium with Ion Exchange, concurring with the Illinois Environmental Protection Agency's designation as the best available technology. Romeoville will be constructing 5 treatment plants at our facilities.

The Romeoville Wastewater Treatment Plants have been receiving influent containing radium since they were first constructed. The Romeoville Northside Wastewater Treatment Plant #1 was placed in service in 1956 and the Romeoville Southside Wastewater Treatment Plant #2 was placed in service in 1964.

The Village of Romeoville Wastewater Treatment Plants incorporate a combined outfall to the DesPlaines River just south of 135th street. It is anticipated that plants discharging to effluent dominated streams could easily exceed the current standard of 1.0 picocuries per liter radium 226.

Department of Public Works

Radium is already being discharged to streams in Illinois and these discharges have been in place for many years with no known negative impacts. The Village of Romeoville strongly supports the continuation of the current practice. Furthermore, there will be no increase in radium as a result of the Illinois Environmental Protection Agency's proposal that no standard is necessary.

Although the Illinois Environmental Protection Agency has proposed a water quality standard without a numerical value, we believe a standard should be established with a numerical value. The Illinois Environmental Protection Agency proposal has been mischaracterized as encouraging more radium pollution and this perception will be eliminated with the implementation of a standard with a numerical value. Measurable limits will allay the concerns of those residents of the State that additional pollution will result from the approval of the Illinois Environmental Protection Agency's proposal.

The Village of Romeoville has not noticed an impact on fish and wildlife from radium discharged from our wastewater treatment plants, nor have we been notified by any State or Federal Agency of such. No increase in radium concentration in the receiving stream will result from the approval of the Illinois Environmental Protection Agency's proposal. As a result, there will be no increase in the concentration in the receiving stream and no impact to aquatic and riparian life associated with the stream.

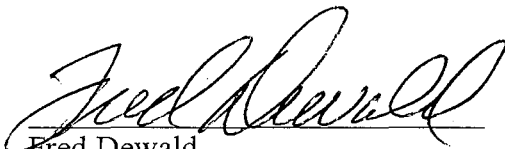
We believe that Water Supplies and Wastewater Treatment Plants should be allowed to make their own decisions concerning the appropriate method of compliance for their community. Standards should be established based on science and treatment methods selected by communities.

Our community is faced with the cost of implementing compliance with the drinking water standard. The approval of an overly restrictive water quality standard will require the additional expenditure of public funds without a proven associated benefit to the public. The Village of Romeoville is committed, per our agreement with the Illinois Environmental Protection Agency, over the next twenty years of capital costs of \$11,251,000 and additional operating and maintenance costs of \$40,287,000, for a total anticipated cost of \$51,538,000 to address Radium issues in Drinking Water. Water Treatment Plant number one is currently under construction, with Water Treatment Plant's two and three currently in the design engineering phases.

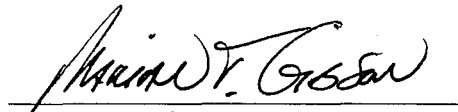
The establishment of water quality standards that eliminate existing discharges will result in the increased costs to our community and residents without additional benefits to the environment.

We appreciate the opportunity to provide comments to the Illinois Pollution Control Board on this important issue to our community.

Sincerely,
Village of Romeoville



Fred Dewald
Mayor



Marian T. Gibson
Village Manager

c.c. Board of Trustees
Congresswoman Judy Biggert
Senator Larry Walsh
Senator Edward Petka
Representative Tom Cross
Representative Brent Hassert