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STATE OF ILLINOIS
Pollution Control Board

December 7, 2006

Illinois Pollution Control Board
Dorothy Gunn, Clerk
JRTC
100 Randolph Street, Suite 11-500
Chicago, Illinois 60601

PC#87

**RE: Proposed Amendments to Dissolved Oxygen Standard
35 ILL. ADM.CODE 302.206
Pollution Control Board Rule R04-025**

Dear Ms Gunn:

The City of St. Charles would like to record its support for the Illinois Association of Wastewater Agency (IAWA), petition R04-025.

We have followed the hearings and reviewed the transcripts from the hearings closely and feel that the evidence supports the position of the IAWA as originally filed. The IAWA petition establishes a dissolved oxygen water quality standard that would safely protect the surface waters and biological resources of the State of Illinois. We feel that the petition is founded in good science and is generally attainable in water systems throughout the state. The IAWA petition contains a seasonal dissolved oxygen standard that is comprehensively protective of early live stages of fish, aquatic insects and benthic organisms and establishes a minimum concentration of 3.5 mg/L, that is more protective than suggested in the USEPA National Criteria Document.

We cannot agree with the position supported by the Illinois Department of Natural Resources and the Illinois Environmental Protection Agency. The agencies have not scientifically proven the case for their proposed oxygen concentrations in surface waters. The data in the record indicates that adoption of the agency proposed dissolved oxygen concentrations would continue a water quality standard that for the most part is unattainable, even in the least disturbed surface water systems. We are especially opposed to the establishment of river segments held to a different standard with out having conducted the scientific due diligence required to produce evidence to justify such a designation.

We encourage the Board to adopt the IAWA petition R04-025 as filed.

Sincerely,

Clifford L. White, Jr.
Environmental Services Superintendent
City of St. Charles

CLW/jj

DONALD P. DEWETTE *Mayor*

BRIAN TOWNSEND *City Administrator*