



# FOX RIVER WATER RECLAMATION DISTRICT

RAYMOND STREET & PURIFY DRIVE / P.O. BOX 328, ELGIN, IL 60121-0328 / PH. (847) 742-2068 FAX (847) 742-0193

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JUN 07 2007

STATE OF ILLINOIS  
Pollution Control Board

*PC #5*

June 5, 2007

Ms. Marie Tipsord  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph - Suite 11-500  
Chicago, Illinois 60601

RE: R2007-009 Sulfate and TDS WQS Proposal

Dear Ms. Tipsord,

Please accept the attached sheet as written public comment for the proposed changes to the Sulfate and Total Dissolved Solids Water Quality Standard on behalf of the Illinois Association of Wastewater Agencies' (IAWA) Water Quality Subcommittee. An original will follow by overnight delivery.

Please contact me if you have any questions. Thank you for your time in consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Rick Manner".

Rick Manner, P.E.  
IAWA Water Quality Subcommittee

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TRIENNIAL REVIEW OF SULFATE AND TOTAL DISSOLVED SOLIDS WATER QUALITY STANDARDS:

IEPA (Illinois Environmental Protection Agency) should be complimented for providing a strong scientific basis to a sulfate limit that was acknowledged to be overly simplistic prior to this. Their work is comprehensive and applicable to the waters of the state of Illinois. The proposed changes are supported by the Illinois Association of Wastewater Agencies (IAWA) Water Quality Subcommittee.

IEPA should be encouraged to assess and correct other limits that have not been rigorously reviewed for decades. Excessively lenient regulations hurt the environment directly if dischargers exceed what the limit should be. Excessively strict limits harm the economy by wasting money in efforts towards monitoring and control at an unnecessary level. Such limits also harm the environment indirectly by wasting natural resources, increasing waste production and/or wasting energy. In that these indirect damages occur every day, their damage could exceed the damage caused by any excessively lenient regulations.

Eliminating the Total Dissolved Solids (TDS) standard is also supported. Any given pollutant which is demonstrated to cause damage should be regulated individually to the extent necessary. If there is a synergistic or antagonistic effect between more than one pollutant that is demonstrated to occur in Illinois, that more complex relationship should be regulated by individual permits or by State regulations. This is the case with the proposed limit on sulfate. However, there is no demonstrable damage to the environment caused by TDS at the concentrations found in Illinois' waters. Retaining the limit would mis-direct compliance efforts towards a standard that has no rationale for existence.

The use of actual flow values for discharges that only occur during precipitation events is strongly supported. This recognizes reality and is protective of the environment.

IEPA's retaining discretion for when their staff should use a particular dilution value is also supported. It is impossible to account for all possible scenarios when writing regulations. To attempt to do so would unnecessarily burden the Board and the regulations with minutiae that would be subject to change at each permit cycle. IEPA's professional staff should be trained to enforce explicit standards in most cases. They should also be trained to understand the purpose of a regulation and account for particular circumstances in selected situations. This is appropriately their responsibility and they should retain the authority to apply appropriate discretion.

IEPA's decision to not propose standards for extremely high levels of sulfate and hardness is an appropriate decision. Similarly, not analyzing every possible combination of pollutants and every possible synergistic effect of pollutants is also appropriate. These decisions properly conserve staff and research efforts, as well as Pollution Control Board time for realistic situations for the State of Illinois.



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STATE OF ILLINOIS  
Pollution Control Board

To: JOHN THERIAULT

Company: IPC B

Fax No. 312-814-3669

From: RICK MANNER

Date: JUNE 7, 2007

Time: 3:20 PM

Re: RULEMAKING 2007-009  
SULFATE & TDS WATER  
QUALITY STANDARD

Remarks: THE ATTACHED PAGES ARE FROM  
THE ILLINOIS ASSOCIATION OF  
WASTEWATER AGENCIES WATER  
QUALITY SUBCOMMITTEE.

THIS IS PAGE 1 OF 3 PAGES BEING TRANSMITTED. IF ANY PROBLEMS OCCUR, PLEASE CALL (847) 742-2068.

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