

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD)	
ILLINOIS, VILLAGE OF ORLAND PARK,)	
ORLAND PARK ILLINOIS, VILLAGE OF)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,)	
VILLAGE OF TINLEY PARK, TINLEY PARK)	
ILLINOIS, EXXONMOBIL OIL CORPORATION,)	
VILLAGE OF WILMETTE,)	
WILMETTE ILLINOIS, CITY OF COUNTRY)	
CLUB HILLS, COUNTRY CLUB HILLS)	
ILLINOIS, NORAMCO-CHICAGO, INC.,)	
FLINT HILLS RESOURCES JOLIET LLC,)	
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VILLAGE OF SKOKIE, SKOKIE ILLINOIS,)	PCB 16-15 (Orland Park)
ILLINOIS DEPARTMENT OF)	PCB 16-16 (Midlothian)
TRANSPORTATION, METROPOLITAN)	PCB 16-17 (Tinley Park)
WATER RECLAMATION DISTRICT OF)	PCB 16-18 (ExxonMobil)
GREATER CHICAGO, VILLAGE OF)	PCB 16-20 (Wilmette)
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JOLIET ILLINOIS, MORTON SALT, INC.,)	PCB 19-7 (Village of Lynwood)
CITY OF PALOS HEIGHTS, PALOS HEIGHTS)	PCB 19-8 (Citgo Holdings)
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ILLINOIS and VILLAGE OF RIVERSIDE,) PCB 19-36 (Skyway)
RIVERSIDE ILLINOIS) PCB 19-37 (Elwood)
) PCB 19-38 (Chicago)
Petitioners,) PCB 19-40 (Crestwood)
) PCB 19-48 (Riverside)
v.)
)
ILLINOIS ENVIRONMENTAL PROTECTION)
AGENCY,) (Time-Limited Water Quality
) Standard)
Respondent.) (Consolidated)
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NOTICE OF FILING

To: Don Brown, Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
Via Electronic Mail

Brad Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
Via Electronic Mail

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that on September 23, 2019, the VLLAGE OF CRESTWOOD electronically filed with the Office of the Clerk of the Pollution Control Board its **Response to the Hearing Order of the Illinois Pollution Control Board dated July 24, 2019**, a copy of which is hereby served upon you.

Respectfully submitted,

The Village of Crestwood

By /s/ David B. Sosin

Petitioner's Attorney

CERTIFICATE OF SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned attorney certifies that on September 23, 2019, a true and correct copy of this Notice of Filing was served via electronic mail upon the attached service list.

/s/ David B. Sosin

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)	(Consolidated)
Respondent.)	
)	

PETITIONER’S RESPONSE TO THE HEARING ORDER OF THE ILLINOIS POLLUTION CONTROL BOARD DATED JULY 24, 2019

NOW COMES, the Village of Crestwood (“Crestwood”), an Illinois municipal corporation, and in response to the Hearing Order of the Illinois Pollution Control Board dated July 24, 2019, responds to the following questions:

Questions for Petitioners

13. a) **104.530(a)(2). Identification of the currently applicable water quality standard for the pollutant or parameter for which a TLWQS is sought.**

Specific Water Quality Standards

The Joint Petition specifically identifies the currently applicable water quality standard for which a TLWQS is sought as 35 Ill. Adm. Code 302.407(g)(3). This is the 500 mg/L year-round chloride standard that applies to the CAWS/LDPR Aquatic Life Use waters. Joint Pet. at 1.2-1.3. However, while the Joint Petition identifies other waterways within the watershed that are subject to chloride standards for General Use at 35 Ill. Adm. Code

302.208(g) and the CSSC at 35 Ill. Adm. Code 303.449, it is not clear what other water quality standards for which a TLWQS is sought.

The Joint Petition states the scope of the watershed “includes some areas not covered by the Board’s CAWS/LDPR water quality standards. Those areas are covered by the General Use standards, which include the winter chloride standard of 500 mg/L.” Joint Pet. at 1.4. The Joint Petitioners identify the following receiving waters as General Use Waters: Hickory Creek, Union Ditch, Spring Creek, Marley Creek, and East Branch of Marley Creek. Additionally, the Joint Petition points to the CSSC and the Calumet River System, stating, “these reaches still need to be included in the TLWQS for the Watershed” Joint Pet. at 2.2. The chloride water quality standard applicable to the CSSC is 35 Ill. Adm. Code 303.449; however, Joint Petitioners note, “[A]s to the CSSC, it is not yet known whether the site-specific criteria for that reach that were adopted by the Board will be approved by U.S. EPA. If not, then the 500 mg/L standards for the rest of the Watershed would apply.” Joint Pet. at 2.2.

While both the General Use chloride standard at 35 Ill. Adm. Code 302.208(g) and the CAWS/LDPR standard at 35 Ill. Adm. Code 302.407(g)(3) a

a) Please identify each of the currently applicable water quality standards for which a TLWQS is sought for the various use designations. Please comment on any necessary revisions to Table 1 below based on the response.

RESPONSE: Chloride levels in the winter months of December through April.

Seasonally Applicability of TLWQS. The information and monitoring data provided in the appendices focus on chloride levels in the winter months of December – April. For example, the Joint Petition states, “The monitoring results for chloride levels in the Watershed during the period of January 2006 through April 2017 indicate that many of the reaches do not consistently meet the water quality standards in the winter.” Joint Pet. at 2.1.

While the current chloride standards for General Use at Section 302.208(g) and CAWS/LDPR at Section 302.407(g)(3) apply year-round, the previously applicable TDS/chloride standards at 302.407(g)(2) and the CSSC chloride standard at 303.449 are seasonal.

b) Please clarify if petitioners are seeking a TLWQS for only the winter months of December–April. If not, please provide additional justification for including summer months.

RESPONSE: Petitioner is seeking a TLWQS for the winter months only.

14. **104.530(a)(4) a map of the proposed watershed, water body or waterbody segment to which the TLWQS will apply, as well as a written description of the watershed, water body, or waterbody segment, including the associated segment code;**

The Joint Petition lists specific waterbodies within the proposed chloride TLWQS watershed, and the individual submittals reference specific waterbodies for the locations of the discharges. (Joint Pet. at 1.4). The map of the proposed chloride watersheds (Joint Pet. App. 4) does not specifically identify these waterbodies.

a) For clarity, please specifically depict and label each of these waterbodies on the map of the proposed chloride TLWQS watersheds.

RESPONSE: Cal Sag Watershed. Labeled map attached.

b) Additionally, please identify each of the segments by aquatic life use for the Board's current rules.

RESPONSE: The Village has no information regarding any aquatic life.

c) 35 IAC 104.530(a)(4) requires the "associated segment code." For the area encompassed by the outlined Proposed Chloride Watersheds, please provide the Hydrologic Unit Codes (HUC). Please depict on the map the HUC to the level that was used to delineate the outline, such as: HUC2 (Regions), HUC4 (Subregions), HUC6 (Basin), HUC8 (Subbasins), HUC10 (Watersheds), and HUC12 (Subwatersheds).

15. **104.530(a)(12) the proposed highest attainable condition of the watershed, water body, or waterbody segment identified in subsection (a)(4) expressed as set forth in Section 104.565(d)(4), including projected changes in the highest attainable condition throughout the proposed term of the TLWQS**

The "highest attainable condition" is defined as the "highest attainable interim use and interim criterion" or "interim use and interim criterion" per Section 104.565(d)(4)(B)(i), (ii) (35 Ill. Adm. Code 104.565(d)(4)(B)(i), (ii)).

For an interim criterion, Joint Petitioners propose either a range from 269 to 280 mg/L or a single value of 275 mg/L chloride, where compliance would be assessed as a five-year average of the prior five winters at Lockport (representing the downstream end of CAWS) and at Channahon (representing the downstream end of LDPR). Joint Pet. at 8.2.

As a basis for the proposed interim criterion, the Joint Petition cites the winter seasonal average or estimated seasonal average chloride concentrations for the following locations: Ruby Street Bridge is 255 mg/L (2015-2017), Channahon is 199 mg/L (2017), and Lockport is 208 mg/L (2017). Joint Pet. at 8.1. Estimated chloride concentrations based on specific conductance are graphed in App. 56 as Figure 3 for Ruby Street Bridge (2016-2017), as Figures 4 and 6 for Channahon (2016-2017), and as Figure 5 for Lockport (2007-2015). Measured weekly chloride concentrations are listed in App. 14 for Ruby Street Bridge and Channahon, and in App. 55 for Lockport, but without yearly averages.

a) Please cite the sources for the above values of 255 mg/L, 199 mg/L, and 208 mg/L.

RESPONSE: The Village took no such readings at the location referred to in the order and has no information to supply in these areas located far from the Village. The Village does independent testing approximately annually.

b) Petitioners state, “[T]he best indicator of progress in reducing chloride loading to the Watershed is going to be the long-term trend, looking at chloride levels at representative locations in the Watershed on an annual basis.” Joint Pet. at 8.1. Joint Petitioners provide no specifics, however, as to how the proposed interim criterion would be implemented. Please address the following items and suggest revisions to draft Condition #5 under Question #20 below:

1) If the frequency of measurements will be specified;

RESPONSE: Petitioner proposes a semi-annual measurement in February and July or August at Tinley Creek, Laramie Ditch, Cal-Sag Tributary and the East Crestwood Ditch.

2) If compliance with the interim criteria, after the first five years, would be assessed on an annual basis going forward using the previous 5 winters or more frequently;

RESPONSE: Petitioner believes a peak winter and peak summer measurement is reasonable.

3) If Joint Petitioners will consider proposing a new interim criterion during the 5-year re-evaluation cycles;

RESPONSE: Petitioner believes that ascertainable levels should be adjusted annually for the five year period toward a final goal.

4) If the CAWS compliance point would be where MWRD conducts instream water quality sampling at the Lockport Forebay on the CSSC (RM 290.9), just upstream of the confluence with the Des Plaines River (see App. 56 at 2-3.);

RESPONSE: Petitioner has no comment on this compliant point since it is far removed from its watershed.

5) If the LDPR compliance point would be the USGS gage 05539670 in Channahon, IL or the Des Plaines River at Oil Tanking (Site LPRCW_03) at River Mile 275.8 in Channahon, IL (See App. 14, App. 56 at 7, A-2. A3.);

RESPONSE: Petitioner has no comment on this compliant point since it is far removed from its watershed.

6) If these are the only two locations where compliance would be determined;

RESPONSE: Petitioner is not aware of any data that suggests a number or the location of compliance points and the existence of funding for this activity. Petitioner has identified points of compliance in a prior response that are located in the Village of Crestwood.

- 7) If separate compliance points are needed for the CSSC or General Use segments;

RESPONSE: Same response as in 6) above.

- 8) If monitoring and modeling would be required for edge of mixing zone compliance demonstrations in NPDES Permits; and

RESPONSE: Petitioner is not aware of any studies or data that suggest monitoring and modeling would be required for edge of mixing compliance demonstrations.

- 9) If monitoring would be for chloride or if monitoring would be for conductance and then, using the linear regression model discussed in App. 56, be translated into an estimated chloride concentration.

RESPONSE: Petitioner is currently investigating the best method for monitoring and compliance. Investigation continues.

16. **104.530(a)(13) a demonstration of the pollutant control activities proposed to achieve the highest attainable condition, including those activities identified through a Pollutant Minimization Program**

The Joint Petition states that under the TLWQS each of the petitioners would be “required to prepare a Pollutant Minimization Plan that will identify the BMPs and the implementation deadlines for monitoring, recordkeeping, and reporting associated with the TLWQS, including appropriate documentation procedures . . . Additionally, progress reports for each petitioner will be required in an annual report that will be submitted to Illinois EPA.” Joint Pet. at 9.1. For each of the discharger’s source categories, the Joint Petition provides lists of BMPs and a schedule for implementation of all phases of the control program. (Joint Pet. at 2.08-2.19, 9.3-9.11)

The BMPs address deicing activities by the petitioners’ own operations. The Joint Petition does not mention the contribution by entities within the jurisdiction of the petitioners, such as homeowners and facility owners whose runoff discharges to the Publicly Owned Treatment Works (POTW), MS4, or CSO. MS4 permits generally contain a public education and outreach component on storm water impacts as part of a storm water management program.

RESPONSE: Petitioner conducts no such de-icing activities of equipment or aircraft.

IEPA’s recommendation suggests chloride workgroups conduct outreach to educate and train citizens and business on reducing chlorides. Rec. at 15. IMTT Illinois commented that public education and outreach are tasks that the General Assembly assigns to IEPA. PCB 19-17 Response to IEPA Recommendation 4-19-19 at 3.

- a) Please comment on proposing language for conditions drafted below under Question #20 that addresses the work groups' responsibilities for public education and outreach on chloride use.

RESPONSE: Petitioner has no objection to participation of Village personnel in work groups and suggests that work groups should be divided by the type of entity and its size. For the Village of Crestwood, the Village would suggest that small Villages (under 10,000 residents) should be grouped in one work group.

- b) IEPA suggested, "In its order granting the TLWQS, the Board should identify the detailed set of measures the workgroup must implement." Rec. at 15. For the conditions drafted below under Question #20, please comment on proposing a detailed set of measures the workgroup must implement.

RESPONSE: The Village of Crestwood will participate and intends to work with other Villages in the work group, major businesses using salt and conduct a public awareness to homeowners and businesses to reduce the use of salt.

17. 104.530(a)(15) a proposed re-evaluation schedule to re-evaluate the highest attainable condition during the term of the TLWQS if that proposed term is longer than five years

RESPONSE: Petitioner believes the entire program should be re-evaluated in five years.

The Joint Petition states, "As a condition of the TLWQS, dischargers would be required to participate in the group that conducts and submits this reevaluation. As noted above, the group structures will be developed, so that Petitioners can work collectively on activities under the TLWQS that require group effort." Joint Pet. at 10.2.

IEPA's Recommendation contained a proposed condition regarding a requirement to participate in such a workgroup. Rec. Att. 1. IEPA's Recommendation pointed out that the language of the General NPDES Permit No. ILR40 Special Condition D states:

If the permittee performs any deicing activities that can cause or contribute to a violation of an applicable State chloride water quality standard, the permittee must participate in any watershed group(s) organized to implement control measures which will reduce the chloride concentration in any receiving stream in the watershed. IEPA Rec. at 15.

IMTT Illinois requested guidance on this requirement, including the specific purpose, what the workgroup is intended to accomplish, rules of group governance, the rights of smaller and non-members, and the Board's or IEPA's authority to require membership. PCB 19-17 Response to IEPA Recommendation 4-19-19.

Since both Joint Petitioners and IEPA are proposing a requirement to participate in a chloride workgroup as a condition of the TLWQS, please comment on proposing specific language for adoption in a Board Order containing the necessary details in draft Condition 4 under Question #20 below.

RESPONSE: The Petitioner conducts no de-icing activities other than limited use of Chlorides on horizontal surfaces. The Village maintains and believes all permit holders should similarly maintain detailed and accurate record of salt usage for comparison based on population, street surface distances and other relevant factors.

18. **104.530(c) For a watershed, water body, waterbody segment, or multiple discharger TLWQS, the petition or amended petition may also include proposed eligibility criteria to be adopted by the Board to be used at the time of renewal or modification of an individual's federal NPDES permit or at the time an individual files an application for certification under section 401 of the federal Clean Water Act to obtain coverage under a Board-approved TLWQS.**

RESPONSE: Petitioner has no comments since it is not a “multiple discharger.”

In proposing eligibility criteria for dischargers who are not currently petitioners but who may want coverage under the TLWQS at a future date, IEPA states, “[A]ny discharger with a new source of chloride must offset at least their additional loading before receiving coverage under the TLWQS.” Rec. at 27.

- a) What types of guidelines would Joint Petitioners envision for offsets?

RESPONSE: The Petitioner has no opinion on this matter.

- b) Would these dischargers be able to receive offsets from dischargers currently covered under the TLWQS that made quantifiable and verifiable reductions?

RESPONSE: The Petitioner has no opinion on this matter.

- c) Please comment on how IEPA and the dischargers might establish a trading system for such offsets?

RESPONSE: Petitioner has no opinion as to how a trading system would improve quality. The Petitioner believes that a trading system would have just the opposite.

19. **104.565(a) When the Board adopts a TLWQS, the Board will maintain, in its water quality standards, the underlying designated use and criterion addressed by the TLWQS, unless the Board adopts and USEPA approves a revision to the underlying designated use and criterion consistent with 40 CFR 131.10 and 131.11.**

Chloride Rulemaking. A rulemaking was filed on May 21, 2018 proposing to amend the chloride water quality standards for General Use Waters at 302.208(g). See In the Matter of: Proposed Amendments to: 35 Ill. Adm. Code 302.102 and 302.208(g) Water Quality Standards for Chlorides (R18-32).

The Board’s current chloride water quality standard for CAWS/LDPR, besides the CSSC, is the same as the chloride water quality standard for General Use Waters. See R08-9(D) (June 18, 2015), slip op. at 12.1.

- a) Since several of the Joint Petitioners are seeking the TLWQS for their discharges to General Use Waters and since the General Use chloride standard is the same as the CAWS/LDPR chloride standard, please address the potential impact of R1832 and any proposed chloride water quality standard revisions on each individual petitioner.

Compliance Strategy. The Joint Petition does not identify a strategy for eventual compliance. The Joint Petition repeatedly states, “There are no feasible options to achieve standards compliance.” Joint Pet. at 2.1. While Best Management Practices will help reduce chloride loadings to the waterbodies, they are “not expected to result in compliance with the standards – certainly not at any point in the near future.” Joint. Pet. at 2.4 Joint Pet. at 2.4.

The TLWQS rule provides that the Board can adopt a revision to the underlying designated use and criterion during the term of the TLWQS. See 35 IAC 104.565. While Joint Petitioners request a 15-year TLWQS term, no work towards proposing a revision to the underlying designated use or criterion is proposed during this extended period. After 15 years, Joint Petitioners can file for an extension, but the petition must contain “a demonstration of whether new or additional information has become available to indicate the designated use and criterion are not attainable in the future...” See 35 IAC 104.590(c)(3). Joint Petitioners have already indicated the chloride water quality standards are not attainable during the winter now or in the future, but Petitioners do not propose a strategy for eventual compliance, such as performing studies to collect new or additional information to propose a revision of the underlying designated use and/or criterion during the course of the requested 15 years.

- b) Please propose a strategy for eventual compliance.

RESPONSE: Petitioner believes that strategies for eventual reduction will be best formulated in the Work Group setting. It is most important, therefore that Work Groups consist of Village, agencies and businesses with a synergy to one another. Petitioner has been committed to compliance with current regulation and statutes.

Aquatic Life Monitoring. Joint Petitioners make no mention of monitoring aquatic life. During the requested 15-year term, joint petitioners commit to track progress made in implementing BMPs and changes in water quality based on averaging monitoring results once after 5 years, but not aquatic life. Since chloride water quality standards are contained under the Aquatic Life Use designations, monitoring the response of aquatic life to the TLWQS throughout the term is key to ensure the proposed once-in-5-years interim criterion does not result in degradation of the indigenous aquatic life in the proposed chloride watershed.

RESPONSE: Petitioner believes its activities have no effect on aquatic life nor does the Village have the means to monitor aquatic life. The watersheds in the Village are influenced by numerous larger users both up and down stream.

Please comment on proposing monitoring of aquatic life during the requested 15-year term to ensure the proposed once-in-5-years interim criterion does not result in degradation of the indigenous aquatic life in the proposed chloride watershed and to document any improvements.

RESPONSE: Same response and immediately above.

20. 104.565(d) All orders adopting a TLWQS will include...(3) The TLWQS requirements and conditions that apply throughout the term of the TLWQS

104.505(d) A TLWQS, once adopted by the Board and approved by USEPA, will be the applicable standard for the purposes of the Clean Water Act in developing NPDES permit limits and requirements under 35 Ill. Adm. Code 309 for the term of the TLWQS. Any limitations and requirements necessary to implement the TLWQS will be included as enforceable conditions of the NPDES permit for any permittee granted coverage under the TLWQS by the Board or Agency.

The Joint Petition proposes specific language for some conditions and limitations that would be necessary to implement the TLWQS to include in a Board Order. IEPA's Recommendation also proposes some conditions for the TLWQS. Joint Pet. at 9.2 – 9.11; Rec. at 22-24, Att. 1. Petitioners filed responses to IEPA Recommendation on April 16, 18 and 19, 2019 with suggested revisions to the conditions. Given the wide breadth of the TLWQS with multiple dischargers over multiple watersheds with relief from multiple uses and standards, it would be helpful to all parties to see the specific proposed language of the TLWQS before the public prepares for hearing.

Please comment on the following language or propose revised language for a Board Order:

In lieu of the applicable water quality standards for chloride and total dissolved solids for the waterways listed in Table 1 for the dischargers listed in Table 2 and the watershed depicted in Figure 1; the Board grants a Time Limited Water Quality Standard (TLWQS) for chloride subject to the following conditions.

Additional dischargers not listed in Table 2, wishing to be considered eligible under this TLWQS for chloride, must meet the Eligibility Criteria listed below and receive approval from IEPA.

1. Eligibility Criteria

- a) A discharger must be located in the Chicago Area Waterway System (CAWS) or Lower Des Plaines River (LDPR) watersheds as identified by the Board pursuant to Section 104.565(d)(2)(A)(i).
- b) The discharger must belong to one of the classes identified by the Board pursuant to 35 Ill. Adm Code 104.540.
- c) The discharger, if a new source of chloride, must offset at least their additional loading before receiving coverage under the TLWQS.

- d) The discharger must have joined and will be participating in either the CAWS chlorides workgroup or the LDPR chlorides workgroup.
- e) The discharger is committed to implementing a pollutant minimization program which includes all the Best Management Practices (BMP) identified by the Board's order granting the TLWQS.
- f) The discharger is committed to implementing any required BMP not currently being implemented within 12 months.
- g) The discharger must commit to participating in the re-evaluation proposal pursuant 35 Ill. Adm. Code Section 104.580.
- h) The discharger must submit the following information to the Illinois EPA:
 - 1) the location of the discharger's activity and the location of the points of its discharge;
 - 2) identification of discharger's NPDES permits; 3) identification and description of any process, activity, or source that contributes to a violation of the chlorides water quality standard, including the material used in that process or activity;

RESPONSE: The Petitioner is committed to adhere to the final standards as adopted and will continue to review the proposed with other Working Group members. The Petitioner is currently listed in Table 2.

- 4) a description and copy of all Pollutant Minimization Plans that are currently being implemented or were implemented in the past; and
 - 5) identification of any other BMPs being implemented to reduce chloride in the discharge that are not identified by the Board's order granting the TLWQS.
- i) Within 90 days, IEPA must notify the discharger whether it is approved to be covered under this TLWQS. 2. Best Management Practices

2. **Best Management Practices**

- a) The dischargers covered by this TLWQS must implement the Best Management Practices identified in Table 3 according to the Implementation Schedule in Table 4.

3. **Individual Dischargers Covered by this TLWQS**

- a) By the deadline listed in Table 4, dischargers must each prepare a Pollutant Minimization Program for their own operations that identifies the specific BMPs in Table 3 that it will implement along with the applicable monitoring, recordkeeping

and reporting procedures, and the relevant schedule for implementation as provided in Table 4.

- b) By the deadlines listed in Table 4, dischargers must submit an Annual Report to IEPA and the appropriate chlorides workgroup on the discharger's prior year's usage of deicing agents and steps taken to minimize chloride use. Dischargers must make the report publicly available and include the following:

BMPs

- 1) List of the BMPs being used and to what extent
- 2) Analysis of BMPs that the discharger has implemented over the term of the TLWQS, including a discussion of the effectiveness and environmental impact of the BMPs, and any hinderances or any unexpected achievements or setbacks
- 3) Analysis of any alternative treatments or new technology that could be implemented by the discharger to reduce chloride loadings to the waterways

Deicing Agents Used

- 4) Types of deicing agents used and whether they are used as dry, pre-wetted, or liquid (e.g., sodium chloride rock salt, calcium chloride, magnesium chloride, calcium magnesium acetate, potassium acetate, potassium chloride, abrasives, urea, organics)
- 5) Estimate of the amount of chloride salt usage on in the past year and over the term of the TLWQS
- 6) Estimates of relative amounts applied and relative percent coverage achieved by the following types of deicing agents: dry, wet, liquid
- 7) Application practices used (cleared using pre-wetted salt; cleared using anti-icing)
- 8) Application rates (pounds/lane mile or gallons/lane mile) by deicing agent type and storm event (e.g. 1-inch storm event; long duration freezing rain event)
- 9) Description of how application rates varied for different types of weather and how they have changed over the term of the TLWQS.
- 10) Whether the use of liquids was increased, and dry chloride salt application rates were reduced
- 11) Callouts
 - a) Summary of snowfall data

- b) Number of callouts
- c) Quantity and type of precipitation during the callout
- d) Application rate for each type of deicing agent during the callout
- e) Quantity of chloride salt used for each callout

Training

- 12) Annual training that was completed for the entire workforce that applied chloride-based deicing salts
- 13) Identification of additional training that is necessary
- 14) Explanation of why discharger was unable to complete the training identified in the previous annual report

Deicing and Snow Removal Equipment

- 15) Types and numbers of snow and/or ice removal equipment used (e.g., snow plows as well as mechanically controlled spreaders and computer-sensor-controlled spreaders for dry solids, pre-wetted solids, or liquids)
- 16) Description of equipment washing as well as wash water collection and disposal or reuse for making brine

Salt Storage

- 17) Number of chloride salt storage areas
- 18) Number of chloride salt storage areas in fully enclosed structures
- 19) Number of chloride salt storage areas on an impervious pad
- 20) Number of chloride salt storage areas without a fully enclosed storage structure or impervious storage pad
- 21) Information on salt storage methods used to ensure good housekeeping policies are implemented (e.g., cleaned-up salt piles)

Purchases

- 22) Identification of necessary capital purchases and expenditures over the next three years to reduce de-icing chloride salt applications, focused on increased use of liquids and reducing chloride salt application rates as well as cleaning up salt piles. (e.g., new storage structures; new or retrofitted salt spreading equipment necessary to allow for pre-wetting and proper rates of application)
- 23) Explanation of why discharger was unable to make all capital purchases and expenditures identified in the previous annual report.

Environmental Monitoring Data

- 24) Any changes to a facility's NPDES treatment technologies
- 25) NPDES effluent data, if any, for chloride discharges
- 26) Summary of relevant, available instream chloride monitoring data for local waterway (which may reference data gathered by State or Federal agencies or other parties) Projections
- 27) Proposed steps for the coming year
- 28) Description of how the dischargers will implement an adaptive, iterative management approach based on reviewing annual reports to adjust salt application practices to achieve further chloride reductions in the coming year

4. **Chloride Workgroups**

- a) The dischargers covered by this TLWQS must participate in a chloride workgroup whose main goals are working toward the reduction of chloride in the receiving stream and gathering information for the reevaluation.
- b) The dischargers must participate in the workgroup(s) associated with the watershed in which the discharge is located.
- c) Workgroups must convene at least semi-annually and continue meeting throughout the term of the TLWQS.
- d) By the deadlines listed in Table 4, the workgroup must submit a Status Report to IEPA and make the report publicly available. The Status Report must compile and analyze the individual discharger Annual Reports into a watershed-wide report and include the following:
 - 1) Chlorides monitoring data
 - 2) Workgroup's outreach strategy, including efforts to include other dischargers under the TLWQS, and outreach and training for nonpoint sources
 - 3) New BMPs and treatment technologies to reduce chloride loading to the environment
 - 4) Impediments faced by dischargers under the TLWWS that prevent them from completing the training and making all capital purchases necessary to implement the required BMPs
 - 5) Possible solutions to impediments listed in (4)(d)(4)

- 6) Identification and description of any financial, technical, or other assistance the workgroup may be able to provide individual dischargers to overcome the impediments described in (4)(d)(4)
 - 7) Results of criteria measurement and compliance demonstration with the highest attainable condition under Item 5
- e) Workgroups must prepare outreach and educational materials to create awareness about the environmental impacts of chlorides. Workgroups must share these materials with other users of road salt in their local area, including residents, road salt applicators, elected officials, and businesses.

Outreach and education materials may include various forms of social media, incentives for chloride reduction, support for community-based training of commercial road salt spreaders, training for residents and other entities that apply road salt, and funding or other support to implement chloride BMPs in communities where new equipment is not affordable.

- f) Workgroups must coordinate with IEPA to identify communities located in the TLWQS watersheds who have Municipal Separate Storm Sewer System (MS4) permits. Workgroups must reach out to the MS4 communities to remind them of the general permit special condition requiring participation in a watershed chloride workgroup and provide information on participating in their workgroup. Additionally, workgroups must provide MS4 communities with their education materials.
- g) Workgroups must coordinate with IEPA to identify different nonpoint source categories beginning in year seven of the TLWQS term. Workgroups must work with IEPA to prioritize and implement education outreach efforts for nonpoint sources based on their road salting practices and proximity to surface waters.
- (h) Workgroups must identify all sampling points and sampling frequency in a sampling plan to demonstrate compliance with the highest attainable condition as delineated in Item 5.

5. **Criteria Measurement and Compliance Demonstration**

- a) The interim summer criterion for the months of May through November is 500 mg/L.
- b) The interim winter criterion for the months of December through April is 280 mg/L. Compliance is to be assessed as an average of the measurements during the months of December through April at the end of the first five-year term, using a 4-year seasonal average for the first reevaluation period, and then every year thereafter.
- c) Measurements for the interim summer and winter criterion for CAWS must be based on instream water quality sampling at Lockport Forebay on the CSSC (RM 290.9) upstream of the confluence with the Des Plaines River.

- d) Measurements for the interim summer and winter criteria for LDPR must be based on instream water quality sampling at the USGS gage 05539670 at the Des Plaines River at Oil Tanking (Site LPRCW_03) at River Mile 275.8 in Channahon, IL.
- e) Measurements for the interim summer and winter criteria for General Use Waters must be based on instream water quality sampling or modeling at the edge of the permitted mixing zone.
- f) Measurements for the interim summer and winter criteria for CSSC must be based on instream water quality sampling in the CSSC near the confluence of the CSSC with LDPR.

6. **Re-evaluation**

- a) By the deadlines listed in Table 4, dischargers under this TLWQS or the chloride workgroups must submit a proposed re-evaluation under 35 Ill. Adm. Code 104.580, which assesses the highest attainable condition using all existing and readily available information.
- b) To ensure that there is enough data collected to perform the re-evaluation, data collection in the receiving stream that was used in the support of this chloride TLWQS must continue.
- c) Chloride workgroups must evaluate if the chloride sampling plan and data collection needs to be expanded.
- d) At each re-evaluation, dischargers covered under this TLWQS shall evaluate each required BMP, analyze its effectiveness, and provide a recommendation about whether it should be continued as is, modified to improve its effectiveness, or eliminated. The dischargers covered under this TLWQS shall consider any new or innovative technology that could improve water quality if implemented and identify all such technologies.

7. **Time-Limited Water Quality Standard Term**

- a) The term of the TLWQS expires 15 years after USEPA approval.
- b) During the 15-year term, a re-evaluation of the Highest Attainable Condition must be submitted to the Board and subsequently to USEPA six months before the end of each five-year TLWQS period. The discharges in Table 2 must participate in the group that conducts and submits this reevaluation.
- c) If the 280 mg/L interim criterion is not attained at the end of the first five years, then the dischargers covered by this TLWQS must evaluate the feasibility of implementing additional measures beyond those identified in Tables 3 and 4 to reduce ambient chloride levels in the Watershed.

The Agency is directed to modify or issue NPDES Permits for each discharger covered by this TLWQS that incorporate the conditions of this TLWQS, the Best Management Practices in Table 3, and the implementation schedule in Table 4.

Respectfully submitted,

VILLAGE OF CRESTWOOD,

By /s/ David B. Sosin

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