

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)	PCB 16-14 (Homewood)
CORPORATION, VILLAGE OF WILMETTE,)	PCB 16-15 (Orland Park)
WILMETTE ILLINOIS, CITY OF COUNTRY)	PCB 16-16 (Midlothian)
CLUB HILLS, COUNTRY CLUB HILLS)	PCB 16-17 (Tinley Park)
ILLINOIS, NORAMCO-CHICAGO, INC.,)	PCB 16-18 (ExxonMobil)
FLINT HILLS RESOURCES JOLIET LLC,)	PCB 16-20 (Wilmette)
CITY OF EVANSTON, EVANSTON ILLINOIS,)	PCB 16-21 (Country Club Hills)
VILLAGE OF SKOKIE, SKOKIE ILLINOIS,)	PCB 16-22 (Noramco-Chicago)
ILLINOIS DEPARTMENT OF)	PCB 16-23 (Flint Hills Resources)
TRANSPORTATION, METROPOLITAN)	PCB 16-25 (Evanston)
WATER RECLAMATION DISTRICT OF)	PCB 16-26 (Skokie)
GREATER CHICAGO, VILLAGE OF)	PCB 16-27 (IDOT)
RICHTON PARK, RICHTON PARK ILLINOIS,)	PCB 16-29 (MWRDGC)
VILLAGE OF LINCOLNWOOD,)	PCB 16-30 (Richton Park)
LINCOLNWOOD ILLINOIS, CITY OF OAK)	PCB 16-31 (Lincolnwood)
FOREST, OAK FOREST ILLINOIS, VILLAGE)	PCB 16-33 (Oak Forest)
OF LYNWOOD, LYNWOOD ILLINOIS,)	PCB 19-7 (Village of Lynwood)
CITGO HOLDINGS, INC., VILLAGE OF NEW)	PCB 19-8 (Citgo Holdings)
LENOX, NEW LENOX ILLINOIS, CITY OF)	PCB 19-9 (New Lenox)
LOCKPORT, LOCKPORT ILLINOIS,)	PCB 19-10 (Lockport)
CATERPILLAR, INC., CITY OF CREST HILL,)	PCB 19-11 (Caterpillar)
CREST HILL ILLINOIS, CITY OF JOLIET,)	PCB 19-12 (Crest Hill)
JOLIET ILLINOIS, MORTON SALT, INC.,)	PCB 19-13 (Joliet)
CITY OF PALOS HEIGHTS, PALOS HEIGHTS)	PCB 19-14 (Morton Salt)
ILLINOIS, VILLAGE OF ROMEOVILLE,)	PCB 19-15 (Palos Heights)
ROMEOVILLE ILLINOIS, IMTT ILLINOIS)	PCB 19-16 (Romeoville)
LLC, STEPAN CO., VILLAGE OF PARK)	PCB 19-17 (IMTT Illinois)
FOREST, PARK FOREST ILLINOIS, OZINGA)	PCB 19-18 (Stepan)
READY MIX CONCRETE, INC., OZINGA)	PCB 19-19 (Park Forest)
MATERIALS, INC., MIDWEST MARINE)	PCB 19-20 (Ozinga Ready Mix)
TERMINALS LLC, VILLAGE OF MOKENA,)	PCB 19-21 (Ozinga Materials)
MOKENA ILLINOIS, VILLAGE OF OAK)	PCB 19-22 (Midwest Marine)
LAWN, OAK LAWN ILLINOIS, VILLAGE OF)	
DOLTON, DOLTON ILLINOIS, VILLAGE OF)	
GLENWOOD, GLENWOOD ILLINOIS,)	
VILLAGE OF MORTON GROVE, MORTON)	
GROVE ILLINOIS, VILLAGE OF LANSING,)	
LANSING ILLINOIS, VILLAGE OF)	
FRANKFORT, FRANKFORT ILLINOIS,)	

VILLAGE OF WINNETKA, WINNETKA)	PCB 19-23 (Mokena)
ILLINOIS, VILLAGE OF LA GRANGE, LA)	PCB 19-24 (Oak Lawn)
GRANGE ILLINOIS, VILLAGE OF)	PCB 19-25 (Dolton)
CHANNAHON, CHANNAHON ILLINOIS,)	PCB 19-26 (Glenwood)
COOK COUNTY DEPARTMENT OF)	PCB 19-27 (Morton Grove)
TRANSPORTATION AND HIGHWAYS,)	PCB 19-28 (Lansing)
VILLAGE OF NILES, NILES ILLINOIS,)	PCB 19-29 (Frankfort)
SKYWAY CONCESSION COMPANY LLC,)	PCB 19-30 (Winnetka)
VILLAGE OF ELWOOD, ELWOOD ILLINOIS,)	PCB 19-31 (La Grange)
CITY OF CHICAGO, CHICAGO ILLINOIS,)	PCB 19-33 (Channahon)
VILLAGE OF CRESTWOOD, CRESTWOOD)	PCB 19-34 (CCDTH)
ILLINOIS and VILLAGE OF RIVERSIDE,)	PCB 19-35 (Niles)
RIVERSIDE ILLINOIS)	PCB 19-36 (Skyway)
)	PCB 19-37 (Elwood)
Petitioners,)	PCB 19-38 (Chicago)
)	PCB 19-40 (Crestwood)
v.)	PCB 19-48 (Riverside)
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	(Time-Limited Water Quality
AGENCY,)	Standard)
)	(Consolidated)
Respondent.)	

**STATEMENT ON BEHALF OF CITGO HOLDINGS WITH RESPECT TO
PROCEDURE OF THE FEBRUARY HEARINGS**

The Citgo Lemont Refinery has been a participant in various rulemaking proceedings relating to water quality standards in the Chicago Sanitary and Ship Canal for many years. The Board agreed with the testimony presented by the Refinery in the UAA process for the Lower Sanitary and Ship Canal and established a unique winter-time standard for chlorides. The Refinery is participating in this proceeding and would offer these observations with respect to the conduct of the forthcoming hearings.

The Lemont Refinery would suggest that the Board follow its approach used in rulemaking proceedings, taking into account the unique nature of the new Time Limited Water Quality Standard proceedings. Petitions and other information already submitted should be made a part of the hearing record. Additional information, including any matters in dispute, would be

addressed in pre-filed testimony and in testimony presented at the Hearing. We would suggest the following process:

1. All Petitions, Supplemental Information, Responses to the Questions from the Board, Agency Responses and replies to Board and Agency questions and responses be deemed admitted without the need for further testimony.

2. Any party may file testimony to supplement filings already made if they so choose, but are not required to do so. To the extent any party disagrees with statements filed, it should include relevant information to identify the topic or issue in dispute in its pre-filed testimony.

3. Any party may present testimony at the hearing regardless of whether it has filed pre-filed testimony. However, any such testimony shall not be submitted until after all pre-filed testimony and questions to such testimony have been presented at the hearing.

4. The Hearing Officer may make further refinements and adjustments to the presentation of testimony and questions.

The Lemont Refinery appreciates the Board's consideration of these suggestions.

Respectfully Submitted,

CITGO HOLDINGS, INC.

/s/ Jeffrey C. Fort

One of its Attorneys

Dated: December 5, 2019

Jeffrey C. Fort
Dentons US LLP
233 S. Wacker Drive
Suite 5900
Chicago, IL 60606
312-876-8000

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NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on December 5, 2019, CITGO HOLDINGS, INC. electronically filed with the Office of the Clerk of Illinois Pollution Control Board its **STATEMENT ON BEHALF OF CITGO HOLDINGS WITH RESPECT TO PROCEDURE OF THE FEBRUARY HEARINGS**, a copy of which is hereby served upon you.

CITGO HOLDINGS, INC.

By: /s/ Jeffrey C. Fort
One of its Attorneys

Jeffrey C. Fort
Dentons US LLP
233 S. Wacker Drive
Suite 5900
Chicago, IL 60606
312-876-8000

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing **STATEMENT ON BEHALF OF CITGO HOLDINGS WITH RESPECT TO PROCEDURE OF THE FEBRUARY HEARINGS** was electronically filed on December 5, 2019 with the following:

Don Brown, Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500|
100 W. Randolph St.
Chicago, IL 60601

And that copies were sent via email on December 5, 2019 to all parties on the service list attached.

/s/ Jeffrey C. Fort

Jeffrey C. Fort
Dentons US LLP
233 S. Wacker Drive
Suite 5900
Chicago, IL 60606
312-876-8000

Service List

Albert Ettinger	Ettinger.Albert@gmail.com ;
Alexandra B. Ruggie	aruggie@cityofevanston.org ;
Alexandra Wyss	awyss@jolietcity.org ;
Amber M. Samuelson	ASamuelson@rmcj.com ;
Andrew N. Fiske	Andrew.fiske@hklaw.com ;
Benjamin Schuster	Benjamin.Schuster@hklaw.com ;
Brad Halloran	Brad.Halloran@illinois.gov ;
Brett Heinrich	bheinrich@vedderprice.com ;
Carl R. Buck	cbuck@rcklawfirm.com ;
Christopher J. Cummings	chris@CJCummingsLaw.com ;
Chuck Anthony	Anthony Charles R@cat.com ;
D. Danielle Grecic	DG@VNILES.com ;
Daniel Siegfried	Daniel.Siegfried@heplerbroom.com ;
Dana Mehlman	dmehlman@vedderprice.com ;
David Pfeifer	Pfeifer.david@epa.gov ;
David Rieser	David.Rieser@klgates.com ;
David S. Freeman	dfreeman@robbins-schwartz.com ;
David Silverman	dsilverman@msclawfirm.com ;
David Sosin	DSosin@sosinarnold.com ;
David Stoneback	dstoneback@cityofevanston.org ;
Dennis G. Walsh	dgwalsh@ktjlaw.com ;
Don Brown	Don.Brown@illinois.gov ;
E. Kenneth Friker	ekfriker@ktjlaw.com
E. Lynn Grayson	lg@nijmanfranzetti.com
Edward J. Bailey	ebailey@riverside.il.us ;
Eric E. Boyd	eboyd@thompsoncoburn.com ;
Erin K. Lavery	eklavery@ktjlaw.com ;
Felicia Frazier	ffrazier@odelsonsterk.com ;
Fredric P. Andes	fandes@btlaw.com ;
George Mahoney	gmahoney@msclawfirm.com ;
Hart M. Passman	hart.passman@hklaw.com ;
Hugh Dubose	hdubose@cityofevanston.org ;
James McCarthy	james.mccarthy@skokie.org ;
Jared Policicchio	jared.policicchio@cityofchicago.org ;
Jeff Fort	Jeffrey.fort@dentons.com ;
Jeff Fronczak	jeff.fronczak@cookcountyil.gov ;
Joanne M. Olson	Joanne.olsen@illinois.gov ;
John F. Donahue	jdonahue@rmcj.com ;
John P. Antonopoulos	john@avlawoffice.net ;
Katherine D. Hodge	Katherine.Hodge@heplerbroom.com ;
Kristen L. Gale	kg@nijmanfranzetti.com
Lindsay Birt	lindsay.birt@gza.com ;
Lindsey Ott	lott@cityofevanston.org ;
Margaret Conway	Margaret.conway@mwrld.org ;

Electronic Filing: Received, Clerk's Office 12/05/2019

Mario Treto	mtreto@cityofevanston.org ;
Mark Burkland	mark.burkland@hklaw.com ;
Marron Mahoney	mmahoney@msclawfirm.com ;
Martin Shanahan	mshanahan@jolietcity.org ;
Matthew D. Dougherty	Matthew.dougherty@illinois.gov ;
Matthew Welch	mwelch@montanawelch.com ;
Melanie Pettway	Melanie.pettway@skokie.org ;
Michael L. Lorge	michael.lorge@skokie.org ;
Michael Marovich	MAROVICH@HDOML.COM ;
Michael P. Murphy	mpm@heplerbroom.com ;
Michael R. Stiff	mstiff@spesia-taylor.com ;
Peter D. Coblentz	pcoblentz@rmcj.com ;
Peter Etienne	Petienne@stepan.com
Peter Murphy	pmmlawyer@aol.com ;
Richard Rinchich	Richard.rinchich@oak.forest.org ;
Richard S. Porter	rporter@hinshawlaw.com ;
Scott F. Uhler	suhler@ktjlaw.com ;
Sonni Choi Williams	swilliams@lockport.org ;
Stacy Meyers	smeyers@openlands.org ;
Stefanie N. Diers	Stefanie.Diers@Illinois.gov ;
Steven M. Elrod	steven.elrod@hklaw.com ;
Teresa Hoffman Liston	tliston@mortongroveil.org ;
Thomas J. Condon, Jr.	tcondon@pjmchicago.com ;