

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on February 12, 2020, CITGO HOLDINGS, INC. electronically filed with the Office of the Clerk of Illinois Pollution Control Board **PRE-FILED QUESTIONS FOR LAURA BARGHUSEN**, a copy of which is hereby served upon you.

CITGO HOLDINGS, INC.

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

Jeffrey C. Fort
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312-876-8000

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing **PRE-FILED QUESTIONS FOR LAURA BARGHUSEN** was electronically filed on February 12, 2020:

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 February 12, 2020, to all parties on the service list attached.

/s/ Jeffrey C. Fort

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GROVE ILLINOIS, VILLAGE OF LANSING,)	
LANSING ILLINOIS, VILLAGE OF)	
FRANKFORT, FRANKFORT ILLINOIS,)	

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CITGO HOLDINGS, INC.'S PRE-FILED QUESTIONS
FOR LAURA BARGHUSEN

QUESTION NO. 1

Page 2, first paragraph of your testimony. Could you explain how the TLWQ Standard for chloride would ultimately result in greater pollution in these waters? With the implementation of BMPs by the regulated community, what is causing the increase “pollution”?

QUESTION NO. 2

Section II.A. of your testimony. You cite Dr. Soucek’s 2018 work on the fingernail clam sensitivity to cold temperature, and conclude chloride could have a chronic effect on fingernail clams in the winter months. As the chronic value generated at 10 °C by Dr. Soucek was 1,664 mg/L as chloride, can you explain how the fingernail clam will be effected by the Time Limited Water Quality Variance?

QUESTION NO. 3

In the Conclusion section of your testimony, you indicated that recent studies produced by Wang for fatmucket and fingernail clam were added to the databases to calculate water quality criteria would need to be lowered. Did Wang look at toxicity at winter temperatures and therefore relevant to the current TLWQS?

QUESTION NO. 4

If Dr. Socuek's cold temperature chronic value of 1,664 mg/L is included in the database, (as was done in R18-32), is it your contention that this would result in a more restrictive water quality standard than the current 500 mg/L Illinois standard? If yes, could you explain how this would be the case.

Respectfully Submitted,

CITGO HOLDINGS, INC.

/s/ Jeffrey C. Fort

One of its Attorneys

Dated: February 12, 2020

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