

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.)	

PUBLIC COMMENTS OF CITGO HOLDINGS, INC.

Pursuant to the Hearing Officer order, Citgo Holdings, Inc. submits this public comment.

1. Citgo Holdings, Inc. operates its Lemont Refinery (Lemont Refinery) which discharges into the Chicago Sanitary and Ship Canal (“CSSC”). The Lemont Refinery has participated in several variances and the rulemaking proceeding known as the Use Attainability Analysis for the Chicago Area Water Way System. Those proceedings have addressed chloride levels in the CSSC. Pursuant to its NPDES permit, it discharges wastewater to the CSSC.

2. The NPDES permit for the Lemont Refinery includes limitations on the total dissolved solids and particularly a Best Management Practices condition to reduce the quantities of chlorides. A copy of that NPDES permit was submitted with the pre-filed testimony of Jim Huff at the February 18, 2020 hearing held in this matter. Citgo has several years’ experience

now with the BMP conditions in that permit and the benefits of its BMP for reducing chloride discharge.

3. Citgo suggests the “Revised Potential Draft Order Language” proposed by the Board: (Best Management Practice #7) be modified, at least for industrial sources. The requirement that the source “Measure the pavement temperature using equipment installed on road-salt spreading vehicles” is not necessary and may lead to greater discharges of chlorides.

4. The Lemont Refinery’s experience has been that placing the “minimum amount” is sufficient for obtaining the desired results and that it should not be required to purchase new equipment. The Lemont Refinery has an aggressive goal to meet under its NPDES Permit [a substantial reduction in its salt usage] but does not believe the requirement for added equipment to measure pavement temperature is necessary. The Lemont Refinery already uses a hand-held device to measure pavement temperature and sets its equipment for the minimum amount of application. This meets the objectives of BMP #7 and #8 without the need to acquire added equipment.

5. Therefore, we would request that BMP #7 as phrased need not be required for the Lemont Refinery. We would suggest two options: The Board could make these conditions no longer applicable to Industrial Sources. Or the Board could add a clause to BMP #7 for industrial sources as follows: “The source may choose to use a hand held device for measuring pavement temperature and the salt-spreading equipment distributes the minimal amount.”

6. We do agree that pavement temperature is an important parameter. However, buying new equipment to measure pavement temperature is not justified in the experience of the Lemont Refinery.

The Lemont Refinery appreciates the opportunity to share its comments and experience with BMPs for chlorides.

Respectfully Submitted,

CITGO HOLDINGS, INC.

/s/ Jeffrey C. Fort

One of its Attorneys

Dated: March 17, 2020

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ILLINOIS ENVIRONMENTAL PROTECTION)	(Time-Limited Water Quality
AGENCY,)	Standard)
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Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on March 17, 2020, CITGO HOLDINGS, INC. electronically filed with the Office of the Clerk of Illinois Pollution Control Board its **PUBLIC COMMENTS OF CITGO HOLDINGS, INC.**, a copy of which is hereby served upon you.

CITGO HOLDINGS, INC.

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

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true copy of the foregoing **PUBLIC COMMENTS OF CITGO HOLDINGS, INC.** was electronically filed on March 17, 2020 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 March 17, 2020 to all parties on the service list attached.

/s/ Jeffrey C. Fort

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