

**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.	)	

**REPLY BRIEF OF CITGO HOLDINGS, INC. AT THE CLOSE OF TIME LIMITED  
WATER QUALITY STANDARD PROCEEDING FOR CHLORIDE**

Petitioner, Citgo Holdings, Inc., submits these final comments on the TLWQS for Chlorides. We commend the Board, its members and staff, the Agency and its counsel and staff, and the District with its counsel and staff, for managing and directing this proceeding with relative efficiency. We know that the issues of chlorides in the Chicago Area Water System and the Lower Des Plaines River system is vexing, primarily due to snow melt runoff and the need to have safe roadways. The receiving water ways here are not the “fishable swimmable” streams which Congress envisioned over 50 years ago.

Nevertheless, we believe this proceeding can result in a practical and environmentally sound solution. We have a few items to address:

1. We appreciate the subtle change the Agency made to the required BMP conditions relating to temperature measurement in the applicator equipment: that is, if a source has already invested in equipment for applying the treatment materials, it ought not have to buy a new one. [See Illinois EPA's Post-Hearing Comments" filed April 21, 2020, Attachment 1, pg. 32, Table 3, paragraph 7 [relating to recommended BMPs]].

2. Progress in the CAWS ought to be made with regard to the attainment of existing water quality standards. We applaud the Agency recognizing that the winter time chloride standard which the Board adopted in R08-07 can be used to show progress. We agree and support the Agency's revised criteria for using Board water quality standards to assess that there is progress.

3. We do believe that offsets are a worthy topic for further consideration. Citgo has installed added treatment equipment and has a robust measuring system which could be recognized as a source of offsets. Presently, however, we would suggest that the Board clearly allow the Agency to adopt enforceable limitations to recognize offsets from existing sources which could be sold or transferred to new or increases chloride sources. We would think the Board should provide a compliance alternative if it is going to prohibit any new chloride sources into these watersheds.

Respectfully Submitted,  
CITGO HOLDINGS, INC.

/s/ Jeffrey C. Fort  
One of its Attorneys

August 21, 2020

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

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

**NOTICE OF FILING**

To: See Attached Service List

PLEASE TAKE NOTICE that on August 21, 2020, CITGO HOLDINGS, INC. electronically filed with the Office of the Clerk of Illinois Pollution Control Board its **Reply Brief of Citgo Holdings, Inc. at the close of Time Limited Water Quality Standard proceeding for Chloride**, 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 **Reply Brief of Citgo Holdings, Inc. at the close of Time Limited Water Quality Standard proceeding for Chloride** was electronically filed on August 21, 2020 with the following:

Don Brown, Clerk of the Board  
Illinois Pollution Control Board  
James R. Thompson Center, Suite 11-500|  
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And that copies were sent via email on August 21, 2020 to all parties on the service list attached.

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