

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD,	)	
HOMewood ILLINOIS, VILLAGE OF	)	
ORLAND PARK, ORLAND PARK	)	PCB 16-14 (Homewood)
ILLINOIS, VILLAGE OF MIDLOTHIAN,	)	PCB 16-15 (Orland Park)
MIDLOTHIAN ILLINOIS, VILLAGE OF	)	PCB 16-16 (Midlothian)
TINLEY PARK, TINLEY PARK ILLINOIS,	)	PCB 16-17 (Tinley Park)
EXXONMOBIL OIL CORPORATION,	)	PCB 16-18 (ExxonMobil)
VILLAGE OF WILMETTE, WILMETTE	)	PCB 16-20 (Wilmette)
ILLINOIS, CITY OF COUNTRY CLUB	)	PCB 16-21 (Country Club Hills)
HILLS, COUNTRY CLUB HILLS ILLINOIS,	)	PCB 16-22 (Noramco-Chicago)
NORAMCO-CHICAGO, INC.,	)	PCB 16-23 (INEOS)
INEOS JOLIET, LLC, CITY OF EVANSTON,	)	PCB 16-25 (Evanston)
EVANSTON ILLINOIS, VILLAGE OF	)	PCB 16-26 (Skokie)
SKOKIE, SKOKIE ILLINOIS, ILLINOIS	)	PCB 16-27 (IDOT)
DEPARTMENT OF TRANSPORTATION,	)	PCB 16-29 (MWRDGC)
METROPOLITAN	)	PCB 16-30 (Richton Park)
WATER RECLAMATION DISTRICT OF	)	PCB 16-31 (Lincolnwood)
GREATER CHICAGO, VILLAGE OF	)	PCB 16-33 (Oak Forest)
RICHTON PARK, RICHTON PARK	)	PCB 19-7 (Village of Lynwood)
ILLINOIS, VILLAGE OF LINCOLNWOOD,	)	PCB 19-8 (Citgo Holdings)
LINCOLNWOOD ILLINOIS, CITY OF OAK	)	PCB 19-9 (New Lenox)
FOREST, OAK FOREST ILLINOIS,	)	PCB 19-10 (Lockport)
VILLAGE OF LYNWOOD, LYNWOOD	)	PCB 19-12 (Crest Hill)
ILLINOIS, CITGO HOLDINGS, INC.,	)	PCB 19-13 (Joliet)
VILLAGE OF NEW LENOX, NEW LENOX	)	PCB 19-14 (Morton Salt)
ILLINOIS, CITY OF LOCKPORT,	)	PCB 19-15 (Palos Heights)
LOCKPORT ILLINOIS,	)	PCB 19-16 (Romeoville)
CITY OF CREST HILL, CREST HILL	)	PCB 19-17 (IMTT Illinois)
ILLINOIS, CITY OF JOLIET, JOLIET	)	PCB 19-18 (Stepan)
ILLINOIS, MORTON SALT, INC., CITY OF	)	PCB 19-19 (Park Forest)
PALOS HEIGHTS, PALOS HEIGHTS	)	PCB 19-20 (Ozinga Ready Mix)
ILLINOIS, VILLAGE OF ROMEOVILLE,	)	PCB 19-21 (Ozinga Materials)
ROMEOVILLE ILLINOIS, IMTT ILLINOIS	)	PCB 19-22 (Midwest Marine)
LLC, STEPAN CO., VILLAGE OF PARK	)	PCB 19-23 (Mokena)
FOREST, PARK FOREST ILLINOIS,	)	PCB 19-24 (Oak Lawn)
OZINGA READY MIX CONCRETE, INC.,	)	PCB 19-25 (Doton)
OZINGA MATERIALS, INC., MIDWEST	)	PCB 19-26 (Glenwood)
MARINE TERMINALS LLC, VILLAGE OF	)	PCB 19-27 (Morton Grove)
MOKENA, MOKENA ILLINOIS, VILLAGE	)	PCB 19-28 (Lansing)
OF OAK LAWN, OAK LAWN ILLINOIS,	)	PCB 19-29 (Frankfort)
	)	

VILLAGE OF DOTON, DOTON	)	PCB 19-30 (Winnetka)
ILLINOIS, VILLAGE OF GLENWOOD,	)	PCB 19-31 (La Grange)
GLENWOOD ILLINOIS, VILLAGE OF	)	PCB 19-32 (Ingredion)
MORTON GROVE, MORTON GROVE	)	PCB 19-33 (Channahon)
ILLINOIS, VILLAGE OF LANSING,	)	PCB 19-34 (CCDTH)
LANSING ILLINOIS, VILLAGE OF	)	PCB 19-35 (Niles)
FRANKFORT, FRANKFORT ILLINOIS,	)	PCB 19-36 (Skyway)
VILLAGE OF WINNETKA, WINNETKA	)	PCB 19-37 (Elwood)
ILLINOIS, VILLAGE OF LA GRANGE,	)	PCB 19-38 (Chicago)
LA GRANGE ILLINOIS, INGREDION,	)	PCB 19-40 (Crestwood)
INC., VILLAGE OF CHANNAHON,	)	PCB 19-48 (Riverside)
CHANNAHON ILLINOIS, COOK	)	
COUNTY DEPARTMENT OF	)	(Time-Limited Water Quality
TRANSPORTATION AND HIGHWAYS,	)	Standard)
VILLAGE OF NILES, NILES ILLINOIS,	)	
SKYWAY CONCESSION COMPANY	)	(Consolidated)
LLC, VILLAGE OF ELWOOD, ELWOOD	)	
ILLINOIS, CITY OF CHICAGO, CHICAGO	)	
ILLINOIS, VILLAGE OF CRESTWOOD,	)	
CRESTWOOD ILLINOIS and VILLAGE	)	
OF RIVERSIDE, RIVERSIDE ILLINOIS,	)	
	)	
Petitioners,	)	
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

NOTICE OF FILING

TO: Don Brown	Brad Halloran
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500	100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601	Chicago, Illinois 60601
(VIA ELECTRONIC MAIL)	(VIA ELECTRONIC MAIL)

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board an **PETITIONER, EXXONMOBIL OIL CORPORATION'S REPLY BRIEF** a copy of which is herewith served upon you.

Respectfully submitted,

Dated: August 21, 2020

By: /s/ Michael P. Murphy
Michael P. Murphy

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CERTIFICATE OF SERVICE

I, the undersigned, on oath state the following:

That I have served the attached **PETITIONER, EXXONMOBIL OIL**

CORPORATION'S REPLY BRIEF via electronic mail upon:

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That my email address is Michael.Murphy@heplerbroom.com

That the number of pages in the email transmission is 13 pages.

That the email transmission took place before 5:00 p.m. on the date of August 21, 2020.

/s/ Michael P. Murphy

One of Its Attorneys

Date: August 21, 2020

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OF OAK LAWN, OAK LAWN ILLINOIS,	)	PCB 19-29 (Frankfort)
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INC., VILLAGE OF CHANNAHON,	)	PCB 19-48 (Riverside)
CHANNAHON ILLINOIS, COOK	)	
COUNTY DEPARTMENT OF	)	(Time-Limited Water Quality
TRANSPORTATION AND HIGHWAYS,	)	Standard)
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SKYWAY CONCESSION COMPANY	)	(Consolidated)
LLC, VILLAGE OF ELWOOD, ELWOOD	)	
ILLINOIS, CITY OF CHICAGO, CHICAGO	)	
ILLINOIS, VILLAGE OF CRESTWOOD,	)	
CRESTWOOD ILLINOIS and VILLAGE	)	
OF RIVERSIDE, RIVERSIDE ILLINOIS,	)	
	)	
Petitioners,	)	
	)	
v.	)	
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Respondent.	)	

PETITIONER, EXXONMOBIL OIL CORPORATION'S, REPLY BRIEF

Petitioner, ExxonMobil Oil Corporation ("ExxonMobil"), by and through its attorneys, HEPLERBROOM, LLC, submits the following Reply Brief:

ExxonMobil previously noted in its Post-Hearing Brief that, with respect to Table 2, the Receiving Water for ExxonMobil is listed as "DR-KR," which is not listed in the Table Key, and is not listed in Table 1 as an abbreviation for a Receiving Water. In the Revised Potential Draft Order Language in the Board's pre-filed questions (Attachment 1 to the Hearing Officer Order of February 13, 2020), Table 1 was revised to add additional segments of the Lower Des Plaines

River (pp. 15-16), but Table 2 (pp. 18-26) and the Table Key for Table 2 (pp. 25-26) were not updated to reflect the changes to Table 1, and the Receiving Water for ExxonMobil was not updated in Table 2. Based on the current Table 2, the Receiving Water for ExxonMobil should be listed as “DPR: KR-WC,” listed in the Table Key as Des Plaines River from Kankakee River to Will County Line. If the changes to Table 1 are incorporated into Table 2, however, then the Receiving Water for ExxonMobil in Table 2 would be “DPR: I-55 Bridge-BRLD.” In Illinois EPA’s Response to Post Hearing Comments filed on August 21, 2020 (P.C. #9), Table 2 has not been updated to indicate the correct Receiving Water for ExxonMobil. ExxonMobil respectfully requests that the Board make this correction in the final TLWQS.

Respectfully submitted,

EXXONMOBIL OIL CORPORATION, Petitioner

DATE: August 21, 2020

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