

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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ORIGINAL

JUN 30 2008

STATE OF ILLINOIS  
Pollution Control Board

IN THE MATTER OF: )  
)  
WATER QUALITY STANDARDS AND )  
EFFLUENT LIMITATIONS FOR THE )  
CHICAGO AREA WATERWAY SYSTEM )  
AND LOWER DES PLAINES RIVER )  
PROPOSED AMENDMENTS TO 35 ILL. )  
ADM. CODE 301, 302, 303, and 304 )

R08-9  
(Rulemaking – Water)

NOTICE OF FILING

TO:

John Therriault, Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph Street, Suite 11-500  
Chicago, IL 60601

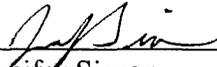
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1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

Persons included on the attached  
SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the  
Pollution Control Board STEPAN COMPANY'S CONCURRENCE WITH MOTION TO  
STAY IPCB R08-9 FILED BY METROPOLITAN WATER RECLAMATION DISTRICT, a  
copy of which is herewith served upon you.

STEPAN COMPANY

  
\_\_\_\_\_  
Jennifer Simon

Date: June 26, 2008

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CERTIFICATE OF SERVICE

RECEIVED  
CLERK'S OFFICE

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STATE OF ILLINOIS  
Pollution Control Board

I, the undersigned, certify that on this 26<sup>th</sup> day of June, 2008, I have served the attached

STEPAN COMPANY'S CONCURRENCE WITH MOTION TO STAY IPCB R08-9 FILED

BY METROPOLITAN WATER RECLAMATION DISTRICT, and NOTICE OF FILING by

U.S. Mail, first class postage prepaid, to the following persons:

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R08-9  
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**STEPAN COMPANY'S CONCURRENCE**  
**WITH MOTION TO STAY IPCB R08-9 FILED BY**  
**METROPOLITAN WATER RECLAMATION DISTRICT**

Pursuant to 35 Ill. Adm. Code 101.500, Stepan Company ("Stepan") respectfully submits this concurrence with the Motion to Stay IPCB R08-9 filed by the Metropolitan Water Reclamation District (the "District") on June 12, 2008. In support of this concurrence, Stepan states as follows:

1. It has reviewed the Motion to Stay and agrees with the District that a stay of the proceedings to allow the Illinois Environmental Protection Agency ("IEPA") to consider additional information is warranted.

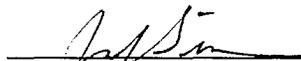
2. In addition to the matters listed in the District's Motion that were not considered by the IEPA, IEPA also did not consider:

- The potential for particulate matter emissions from cooling towers or the ability of possible new sources to obtain air emission permits for cooling tower emissions (March 10, 2008, Hearing (afternoon session), transcript at pp. 26-27 and 30);

- The thermal quality of industrial discharges into the Lower Des Plaines River or their ability to meet the proposed thermal standards (Id. at p. 24); and
- The cost of retro-fitting existing industrial sources with cooling towers to meet the proposed thermal standards (April 23, 2008, Hearing, transcript at pp. 24-25).

WHEREFORE, Stepan concurs with the District's Motion to Stay and requests that the Board grant the relief requested in the District's Motion.

STEPAN COMPANY

  
\_\_\_\_\_  
One of its Attorneys

Date: June 26, 2008

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