

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**RECEIVED**  
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JUN 29 2009

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

R08-09  
(Rulemaking – Water)  
STATE OF ILLINOIS  
Pollution Control Board

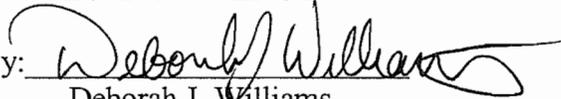
**NOTICE OF FILING**

To: John Therriault, Clerk  
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Illinois Pollution Control Board  
100 West Randolph Street, Suite 11-500  
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**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board Illinois EPA's Pre-Filed Questions for Corn Products Witnesses Alan J. Jirik, James E. Huff, P.E. and Joseph V. Idaszak, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: 

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Dated: June 25, 2009  
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**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

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R08-09  
(Rulemaking – Water)

**Illinois EPA's Pre-Filed Questions for Corn Products witnesses Alan J. Jirik,  
James E. Huff, P.E. and Joseph V. Idaszak**

The Illinois Environmental Protection Agency ("Illinois EPA" or "Agency"), by and through its attorneys, hereby submits its Pre-Filed Questions for Corn Products witnesses Alan J. Jirik, James E. Huff, P.E. and Joseph V. Idaszak based on the pre-filed testimony filed on April 20, 2009 in the above-captioned matter. The Agency reserves the right to ask additional follow-up questions as necessary.

**Pre-Filed Questions for Alan J. Jirik**

1. Your testimony indicates that Corn Products uses the waters of the Chicago Sanitary and Ship Canal at its Argo Plant for non-contact cooling purposes.
  - a. Does Corn Products take intake temperature measurements of these waters? Does Corn Products take effluent temperature measurements? How frequently? What sampling locations are used?
  - b. On page 4, paragraph 1 of your testimony, you state, "The cooling tower enabled Argo to avoid adding thermal load to its existing NPDES discharge, and allows Corn Products to remain in compliance with the thermal limits in its NPDES permit. Thus, it is Corn Products' opinion that

Argo is near the approximate limit of its allowable thermal discharge to the Sanitary & Ship Canal water for cooling purposes at Argo.” What restrictions are placed in Corn Products’ NPDES permit regarding intake and effluent temperatures?

- c. How is compliance with these permit requirements determined?
  - d. Have the effluent temperatures at Corn Products ever exceeded the proposed CAWS Aquatic Life Use B daily maximum temperature of 90.3 degrees Fahrenheit? If so, did the exceedances occur “for more than 2 percent of the hours in the previous twelve month period?”
  - e. Does Corn Products’ effluent temperature ever exceed 93.9 °F?
  - f. What is your highest recorded effluent temperature in the last five years?
  - g. Does Corn Products calculate monthly average effluent temperatures? Do these temperatures exceed the proposed period averages? If so, during which months?
  - h. Does Corn Products collect temperature data at the edge of its mixing zone? If not, why not? If so, can you submit that monitoring data for the Record?
2. What is the design average flow of Corn Products’ Argo Plant? What is the design maximum flow of the facility? What is the average flow of the Corn Products facility? Do you know what the 7Q10 flow of the Chicago Sanitary and Ship Canal is at the Corn Products facility?
- a. What portion of the Chicago Sanitary and Ship Canal does Corn Products use for cooling water?

- b. What proportion of the Argo Plant's effluent is discharged to the Chicago Sanitary and Ship Canal? What portion is sent to MWRDGC for treatment?
3. On page 7 of your testimony, you state that the Chicago Sanitary and Ship Canal is a "relatively recently created artificial man-made channel." "Recently created" in relation to what?
4. On page 8 of your testimony you state that the Chicago Sanitary and Ship Canal is more like an aqueduct than a natural stream or river.
  - a. How would you define a "natural" stream or river?
  - b. Explain how this is different from the Chicago River, North Branch Chicago River below North Avenue Turning Basin, South Branch Chicago River, South Fork of South Branch, Brandon Pool, Lake Calumet connecting channel and the CAWS and Brandon Pool Aquatic Use B segment of the Calumet River?
  - c. What are the criteria that differentiate an "aqueduct" from a stream?
  - d. Where in the proposed use designation is the Chicago Sanitary and Ship Canal considered a natural river?
  - e. Does the proposed Aquatic Life Use B designation include the phrase "...in deep-draft, steep-walled shipping channels?"
5. Your testimony states on page 8 that the Chicago Sanitary and Ship Canal provides a commercially important navigation function. Is this different from the Upper Dresden Island Pool, Brandon Pool, South Branch Chicago River

and Cal-Sag Channel? Is it different than the Mississippi River or the Illinois River?

6. In the first full paragraph on page 8, you state that MWRDGC leases land along the Chicago Sanitary and Ship Canal to industrial users who do not support or encourage public or pedestrian activities along the Chicago Sanitary and Ship Canal. Are you aware that there are public boat ramps at Archer Avenue (river mile 313) and Western Avenue (river mile 320.6)?
7. In your updated testimony there is no reference to your position on the Agency's Recreational Use designation for the Chicago Sanitary and Ship Canal. Have you withdrawn your objection to the Agency's Recreational Use designations for the Chicago Sanitary and Ship Canal?
8. The last paragraph on page 10 states, "... Corn Products' testimony supports that applying a Use B designation to the Sanitary and Ship Canal is both inappropriate and unwarranted."
  - a. Which aspects of the CAWS Use B definition in section 303. are unwarranted?
9. Why do you believe that the Chicago Sanitary and Ship Canal is sufficiently distinct to support a unique classification for aquatic life uses?
10. On pages 10 and 11, you suggested the creation of an appropriate designation such as a "Use C", but failed to provide a description of this use. How would you define the CAWS Use C waters for regulatory purposes?
  - a. What types of aquatic organisms, if any, would this "Use C" protect?

- b. Would you agree that it is not the proposed designated use that you disagree with, but rather the proposed water quality standards for that proposed designated use?
11. Will you be proposing language to the Board for aquatic life uses of the Chicago Sanitary and Ship Canal?
12. How will you distinguish the use designation for the Chicago Sanitary and Ship Canal from the following reaches:
- a. North Branch Chicago River from the south end of the North Avenue Turning Basin to its confluence with the South Branch Chicago River and Chicago River?
  - b. From the Chicago River?
  - c. From the South Branch Chicago River to its South Fork?
  - d. From Calumet River from Lake Michigan to Torrence Avenue?
  - e. From the Lake Calumet Connecting Channel?
  - f. From the Lower Des Plaines River from its confluence with the Chicago Sanitary and Ship Canal to the Brandon Road Lock and Dam?
13. In the last paragraph on page 4, you state that categorizing the Chicago Sanitary and Ship Canal as a Use B will provide no meaningful improvement of fisheries relative to current conditions.
- a. What types of fish (intolerant, tolerant, etc.) are currently present in the Chicago Sanitary and Ship Canal?
  - b. What type of aquatic life is considered to be predominating in the proposed Aquatic Life Use B waters?

14. In reference to the end of paragraph 1 on page 5, can you explain what you mean by fisheries “above average quality” and “below average quality?”
15. On page 10, paragraph 2, you state; “As our expert will testify, the Sanitary & Ship Canal fisheries are not limited by the current thermal environment ...”  
Does the presence of only thermally tolerant species indicate an impact to the aquatic life?
16. You quote from the Board opinion in AS 96-10 to conclude that the Board has recognized the unique character of the Chicago Sanitary and Ship Canal. Did this opinion distinguish the Chicago Sanitary and Ship Canal from the Lower Des Plaines River or South Branch Chicago River?
17. Does AS 96-10 apply to Corn Products? Why or why not?
18. Does the thermal discharge from Corn Products’ Argo facility impact compliance with the General Use thermal standards below the I-55 Bridge?
19. On page 5, paragraph 2, you state, “There is ample evidence in the record that demonstrates that the Sanitary & Ship Canal does not meet the proposed Use B thermal water quality standards.” Which stations are you talking about?
  - a. Have you looked at temperature data from Romeoville Road or River mile 302.6?
  - b. Why does your testimony assume that the upstream dischargers will not comply with the water quality standards?
20. How would your facility be impacted if the electrical generating facilities located upstream were required to add supplemental cooling capacity?

21. What impact would the possible shuttering of the Crawford and/or Fisk Generating Stations have on the thermal assimilative capacity at the point of Corn Products' intake from the Chicago Sanitary and Ship Canal?
  - a. How far upstream from Corn Products are the discharges of the Midwest Generation Fisk and Crawford plants and MWRDGC Stickney MWWTP?
22. Do you work at the Argo Facility? If so, for how many years have you worked there?
23. When and why did Corn Products decide to hire Mr. James E. Huff to review the Use Designation proposed by the Illinois Environmental Protection Agency for the Chicago Sanitary and Ship Canal?
24. When and why did Corn Products decide to hire Ambitech Engineering Corporation to evaluate the options available for Corn Products to maintain its current use of noncontact cooling water obtained from the Chicago Sanitary and Ship Canal?
25. Please submit the data referenced in Attachment 1 to your revised testimony for the Record. Can you explain why some of the period average intake temperatures are higher than the individual samples in Attachment 1?

**Pre-filed Questions for James E. Huff, P.E.**

1. Beginning in the final paragraph on page 2 of your testimony, you state, "Illinois EPA is proposing to classify the Sanitary & Ship Canal as an Aquatic Life Use B Water, a group that also includes the North Branch Chicago River, the Chicago River, the South Branch Chicago River, the Calumet River to Torrence Avenue, the Lake Calumet Connecting Channel, and the Lower Des Plaines River from the Sanitary & Ship Canal to the Brandon Road Lock and Dam." You go on to state, "With the exception of the Lake Calumet Connecting Channel and the Sanitary & Ship Canal, all of the waterways in this group are natural waterways. A proper consideration of the uniqueness of the artificially created and physically constrained Sanitary & Ship Canal is lost by including it in this grouping."
  - a. Do the following waterways resemble their natural conditions: North Branch Chicago River, the Chicago River, the South Branch Chicago River, the Calumet River to Torrence Avenue, and the Lower Des Plaines River from the Sanitary & Ship Canal to the Brandon Road Lock and Dam?
  - b. Is there a significant difference between the list of segments above and the segments you describe as artificially created?
2. On page 3 of your testimony, the last paragraph states, "If the Lower Des Plaines River ("LDPR") was deemed hopeless due to the contribution from the Sanitary & Ship Canal, what does that imply about the potential of the Sanitary & Ship Canal itself?" Have the aquatic communities in the Lower Des Plaines River improved

since this comment was made in the 1970s? How about in the Chicago Sanitary and Ship Canal?

3. Do you believe that no improvement in the aquatic community in these waters is attainable? Why?
4. You state on page 4 that "Taken from a biological perspective, the Sanitary & Ship Canal therefore essentially terminates at the fish barrier." Please explain what is meant by this statement.
5. You also indicate on page 4 that due to habitat limitations in the Chicago Sanitary and Ship Canal a balanced indigenous population of fish cannot be attained. What do you mean by "a balanced indigenous population?"
6. With regard to Tables 3-2 and 3-3 of your Thermal Report, for each year and river mile, what were the number of fish collections?
  - a. Do you know the temperatures present during the fish collections?
  - b. Was the water temperature warmer or cooler than the proposed water quality standards at the time of the fish collection?
  - c. Were they Spring or Fall collections, or were they taken during the Summer?
7. You state on page 6 of your testimony that "In essence, Illinois EPA discounted Mr. Yoder's analysis, and set the non-summer temperatures so that the MWRDGC would not have to install cooling towers. Implicit in this decision was that the cost of such cooling towers could not be justified..."

- a. What evidence do you have that Illinois EPA considered the cost of installing cooling towers by MWRDGC? Do you have any information regarding the cost of installing cooling towers by MWRDGC?
  - b. Should the Agency have relied on the Route 83 CSSC station data alone in setting background temperatures rather than also using MWRDGC effluent data?
  - c. Should the Agency have excluded Route 83 CSSC data where it allowed for higher background temperature values than the MWRDGC effluent data?
  - d. Should the Agency have relied on data from the Cal-Sag Channel or the Des Plaines River upstream of the confluence with the CAWS?
  - e. What measure of background temperature would you recommend?
8. On pages 6-7 of your testimony you state, "No attempt was made to look at the Sanitary & Ship Canal temperatures at the edge of the mixing zones from these industrial discharges." Please provide any data you have that was collected at the edge of a mixing zone for any of the industrial dischargers on the CSSC and a map of the applicable mixing zones.
9. You state on page 7, "Had Illinois EPA factored in the thermal loadings on the Sanitary & Ship Canal instead of arbitrarily setting the Spring/Fall months at the MWRDGC effluent temperatures, a very different regulatory proposal would have resulted." Please explain how to go about 'factoring in' the thermal loadings on the CSSC into a regulatory proposal and define what such a proposal would look like.

10. Please explain why you conclude on page 7 that “the Sanitary & Ship Canal will be determined to be thermally impaired throughout its entire length.”
- a. During what periods did you find the temperatures at Route 83 on the CSSC to violate the proposed thermal standards?
  - b. Why is the same color used on Attachment 1 for Route 83 on the CSSC and the Illinois EPA proposal? Can you provide a copy of this Attachment with different colors for these two lines on the graph?
  - c. Why does the figure in Attachment 1 only present temperature data from August 1998 through 2002, when data is available through June 2007?
  - d. Did you look at temperature data from River mile 302.6 on the CSSC for compliance with the proposed standard? What about the Romeoville Road station?
  - e. How would your conclusion about impairment of the entire CSSC for temperature change if Midwest Generation reduced its thermal loadings upstream of Corn Products to comply with the proposed standards?
11. On page 7, you state that the highest temperatures on the Sanitary and Ship Canal are downstream of the Crawford Power Plant. How did you arrive at this conclusion since Attachment 6 does not contain temperature data upstream of Cicero Avenue?
- a. Are fish and continuous monitoring data available on the South Branch Chicago River at Loomis Street about 0.6 miles downstream of the Fisk Power Plant?

- b. Is Loomis Street located about 0.2 miles upstream of the Chicago Sanitary and Ship Canal?
- c. Why was your analysis limited to only the Chicago Sanitary and Ship Canal?

12. On Figure 1 of your Thermal Report, you graphed the average temperature for July/August for 6 stations. Are you aware that the average temperature at Cicero Avenue, the hottest station recorded, for July/August is below the proposed water quality standard?

13. You state on page 8 of your testimony with regard to the CSSC and the Cal-Sag Channel that "There are differences in historical temperatures between these two deep-draft waterways..." Does this mean that the temperatures in the Cal-Sag Channel are lower at all stations than the temperatures in the CSSC?

14. On page 8, you stated that both the Chicago Sanitary and Ship Canal and Cal-Sag Channel have limited shallow area along the banks and a high volume of commercial traffic. You further state that because of these similarities a comparison of the fisheries quality between these two water bodies would be expected to identify thermal stress.

- a. Is it true that Ed Rankin's Report (Attachment R) indicated that the Cal-Sag Channel has fair habitat quality primarily due to coarse material in the littoral areas?
- b. Did Mr. Rankin also state that this littoral habitat is not isolated but is present along much of the shoreline?

- c. As you indicated on page 4 of your testimony, Mr. Rankin rated the habitat in the Chicago Sanitary and Ship Canal as poor to very poor. Why did you not include Mr. Rankin's fair habitat rating of the Cal-Sag Channel?
- d. Did Mr. Rankin indicate that the Chicago Sanitary and Ship Canal at Lockport, Romeoville and Willow Springs Road were canal-like in nature with steep sides and little functional cover or substrates?
- e. Did Mr. Rankin also indicate that the site at Lockport was wider and had some littoral habitat, but that these were very limited in scope and were extremely embedded with silty mucks and sand that were of poor quality?
- f. Did Mr. Rankin also state that the Chicago Sanitary and Ship Canal widened out between Harlem and Cicero and gained some shoreline shallows that provided a bit more habitat likely to support a slightly better assemblage than in the narrower, more canal-like reaches?

15. On page 8 of your testimony, you indicated that the Chicago Sanitary & Ship Canal and the Cal-Sag Channel have similar fisheries quality. You also indicated that within the Chicago Sanitary and Ship Canal the warmest site had a higher than average species diversity. Is it true that of all the sampling sites and data presented in Attachment 6, that only two sites on the Chicago Sanitary and Ship Canal (Cicero Ave. and Lockport) and one site on the Cal-Sag Channel (Cicero Ave.) had both fish and continuous monitoring temperature data for the entire 2001 through 2005 period?

- a. Are you aware that if your analysis was limited to these three sites, that the Cal-Sag Channel at Cicero Avenue consistently had higher IBI values

(by as much as 6 – 8 points) than the Chicago Sanitary and Ship Canal at Cicero Avenue and at Lockport during four of these five years?

- b. Could the difference in species diversity within the Chicago Sanitary and Ship Canal be due in part to habitat differences at Cicero and Lockport as reported by Mr. Rankin?
- c. Are you aware that although Cicero Avenue tended to have higher numbers of species compared to Lockport, IBI scores were generally the same, being slightly higher at Lockport but by no more than 2 points?

16. Are the average IBI values presented in Table 4-1 of your Thermal Report based on those from MWRDGC?

- a. If this is true, do you know what IBI was used by MWRDGC (e.g. Illinois IBI, Ohio EPA boatable IBI)?
- b. What is a meaningful difference in IBI scores?

17. On page 8 of your testimony, you quote from the Board Opinion in AS96-10 regarding the Agency's conclusion at that time that additional cooling "may not be economically reasonable." Doesn't that same paragraph in the Board opinion also conclude that the Agency found the installation of cooling towers to be technically feasible?

18. Explain why you believe that the CSSC is sufficiently distinct to support a unique use classification for aquatic life uses.

- a. You state on page 9 that "[such] a use category should recognize the existing uses and limitations of the Sanitary & Ship Canal..." Isn't the Board required to adopt the "attainable" uses for these waters?

- b. When you refer to existing uses in your testimony, are you considering waste transport or assimilation to be a use?
- c. How do the proposed thermal standards impact “existing uses” as you indicate on page 9 of your testimony?
- d. Will you be proposing language to the Board for aquatic life uses of CSSC?

### **Pre-filed Questions for Joseph V. Idaszak**

1. Your analysis of options available for Corn Products to maintain its current use of noncontact cooling water obtained from the Chicago Sanitary & Ship Canal was done with the expectation that Corn Products' Argo Plant would need to meet water quality standards. Why then does your analysis assume that other upstream dischargers would not need to meet the water quality standards in the receiving stream?
  - a. Would your analysis change if the water quality standards were met upstream of Corn Products and they were granted a mixing zone?
  - b. Do you think the price would come down from your original analysis?
2. On page 5 of your testimony, paragraph 1 states, "More importantly, the engineering analysis indicates that there are times of the year when the period average standard will still be exceeded."
  - a. When are these "times of the year?"
  - b. How much will it be exceeded by?
  - c. How close to the water quality standard would the effluent be?
  - d. What frequency of monitoring did you consider would be used to calculate the period average?
  - e. Does this analysis assume that the water quality standards are met when the water is withdrawn from the CSSC?
  - f. Does it factor in any mixing with the receiving stream and the effluent?

- g. How would reductions in the intake temperature at the Corn Products intake point impact your analysis of whether mechanical cooling is necessary?
- 3. In your testimony, you state, "Four options were evaluated relative to the feasibility of the continued use of cooling water from the Sanitary & Ship Canal water for process cooling in the case where the Illinois EPA's proposal is adopted by the Illinois Pollution Control Board." Can you explain how you narrowed the available options down to these four?
- 4. If option 2 would result in compliance with Corn Products' NPDES limits under a revised permit following adoption of the proposed thermal limits would you consider that option technically feasible? If not, why not?
- 5. You state on page 5 with regard to Option 3, "Since the capital, operating and maintenance costs are reasonably expected to be higher than with Option 2, along with the unstudied potential processing impacts, this option was eliminated." Please explain this statement.
  - a. Do you believe closed-cycle cooling is technically feasible at the Corn Products Argo facility?
- 6. Explain why construction of a building to shelter the mechanical cooling system is required in Option 4.
- 7. What method did you use to determine that the probable cost of Option 4 is not reasonable? What experience are you relying on to estimate the cost of \$20 million? What is the confidence level of this estimate?

8. What other open or closed-cycle cooling systems have you worked on? Where are the facilities located?
9. Explain the heat balance calculations in your report (Attachment 1).
  - a. Did you prepare Attachment 1?
  - b. Who prepared Attachments A through F?
  - c. Who (from Corn Products) prepared Attachment B?
10. What "available historical data" are you referring to on page 2 of Attachment 1?
  - a. What intake temperature data did you rely on?
  - b. Did you presume that future intake temperatures will be similar to past intake temperatures?
11. Which proposed period average temperature limits would be exceeded using option 2? Where is that found in your report or attachments?
12. Please provide the "system operation logs" you refer to on page 4 of Attachment 1.
13. On pages 4-5 you state, "Since the average discharge water temperatures are available from 2/24/05 to 11/30/07, and average Sanitary & Ship Canal water temperatures are not available, daily maximum and Sanitary & Ship Canal water temperatures are used..." Please explain.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Deborah J. Williams  
Assistant Counsel

Dated: June 25, 2009

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STATE OF ILLINOIS  
COUNTY OF SANGAMON

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SS

**PROOF OF SERVICE**

I, the undersigned, on oath state that I have served the attached Illinois EPA's Pre-Filed Questions for Corn Products witnesses Alan J. Jirik, James E. Huff, P.E. and Joseph V. Idaszak upon the person to whom it is directed by placing it an envelope addressed to:

**See Attached Service List**

and mailing it by First Class U.S. Mail from Springfield, Illinois on June 25, 2009, with sufficient postage affixed.

*Dorinda Lerrin*

SUBSCRIBED AND SWORN TO BEFORE ME

This 25 day of June, 2009

*Brenda Boehner*  
Notary Public



**THIS FILING IS SUBMITTED ON RECYCLED PAPER**

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