

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
)  
WATER QUALITY STANDARDS AND ) R08-9  
EFFLUENT LIMITATIONS FOR THE ) (Rulemaking - Water)  
CHICAGO AREA WATERWAY )  
SYSTEM AND THE LOWER DES ) Subdocket C  
PLAINES RIVER: PROPOSED )  
AMENDMENTS TO 35 Ill. Adm. Code )  
Parts 301, 302, 303 and 304

**NOTICE OF FILING**

To: ALL COUNSEL OF RECORD  
(Service List Attached)

**PLEASE TAKE NOTICE** that on the 23rd day of February, 2011, I, on behalf of the Metropolitan Water Reclamation District of Greater Chicago (the "District"), electronically filed with the Office of the Clerk of the Illinois Pollution Control Board, **the District's Testimony Questions for James E. Huff, P.E.**

Dated: February 23, 2011

**METROPOLITAN WATER  
RECLAMATION DISTRICT OF  
GREATER CHICAGO**

By: /s/ Fredric P. Andes  
One of Its Attorneys

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**PROOF OF SERVICE**

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that I caused a copy of the foregoing, **Notice of Filing and Metropolitan Water Reclamation District of Greater Chicago's Testimony Questions for James E. Huff, P.E.**, to be served via First Class Mail, postage prepaid, from One North Wacker Drive, Chicago, Illinois, on the 23rd day of February, 2011, upon the attorneys of record on the attached Service List.

*/s/ David T. Ballard*

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**METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO'S TESTIMONY QUESTIONS FOR JAMES E. HUFF, P.E.**

1. Page 2. Why is "snow melt runoff" more of a beneficial use for the lower Ship Canal than it is for the upper Ship Canal, or for any other portion of the CAWS?
2. Page 2. You state that some of the waterways covered by the UAA are "natural streams."
  - a. How do you define "natural streams?"
  - b. Do you include channelized, straightened waterways as natural?
  - c. Are the altered waterways in the CAWS sometimes as artificial and lacking in physical habitat as the man-made channels?
3. Page 2. You identify the Lower Ship Canal as "effluent dominated." Isn't the whole CAWS system effluent dominated?
4. Page 2. You talk about segments of the CAWS that are "natural waterways."
  - a. Is the Upper Ship Canal a natural waterway?
  - b. Why do you think that "all of the waterways in this group are natural waterways"?
5. Page 4. You discuss depth, width, vertical walls and steep embankments in the section called "Uniqueness of the Lower Ship Canal."
  - a. How do these characteristics differ from those in the Upper Ship Canal?
  - b. What is "unique" about the Lower Ship Canal other than the existence of the electric barrier?

6. Page 4. You state as follows: "With the potential exception of the Calumet-Sag Channel, as described later in my testimony..." However, the Cal-Sag Channel is not mentioned again in your testimony. What was the point that you wanted to make about the Cal-Sag Channel? Is it similar to the Lower Ship Canal?
7. Page 4. What is the basis for stating "there is no other water body in the CAWS which has the unique physical features, commercial shipping, discharge loadings, and lack of appropriate habitat for aquatic life as the Lower Ship Canal"? What makes the Lower Ship Canal unique other than the fact that it is "specifically associated with efforts to control the spread of invasive species"?
8. Page 5. You list a number of water quality impairments.
  - a. Are you aware that in the draft 2010 303(d) List, total nitrogen and DO are not listed impairments in the CSSC?
  - b. Are the other listed impairments for the Lower Ship Canal similar to those listed in 2010 for the Upper Ship Canal, North Branch Chicago River, Chicago River, Little Calumet River, Cal-Sag Channel, and Grand Calumet River?

Dated: February 23, 2011

Respectfully submitted,

**METROPOLITAN WATER  
RECLAMATION DISTRICT OF  
GREATER CHICAGO**

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