

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 )  
 WATER QUALITY STANDARDS AND )  
 EFFLUENT LIMITATIONS FOR THE )  
 CHICAGO AREA WATERWAYS SYSTEM ) R08-09 Subdocket D  
 AND THE LOWER DES PLAINES RIVER: ) (Rulemaking- Water)  
 PROPOSED AMENDMENTS TO 35 Ill. Adm. )  
 Code Parts 301, 302, 303 and 304 )

**NOTICE OF FILING**

To:

John Therriault, Clerk  
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 James R. Thompson Center  
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 Chicago, IL 60601

Persons included on the attached  
SERVICE LIST

PLEASE TAKE NOTICE that on December 6, 2013, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois **ENVIRONMENTAL GROUPS' PRE-FILED QUESTIONS TO: LIAL F. TISCHLER, JAMES E. HUFF, P.E., ROGER KLOCEK and LARRY TYLER**, a copy of which is attached hereto and herewith served upon you.

Respectfully Submitted,




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DATED: December 6, 2013

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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35 Ill. Adm. Code Parts 301, 302, 303 and 304 )  
(Aquatic Life Use Designations) )

**ENVIRONMENTAL GROUPS' PRE-FILED QUESTIONS TO JAMES E. HUFF, P.E.**

Environmental Law & Policy Center, Natural Resources Defense Council, Openlands, Friends of the Chicago River, Prairie Rivers Network, and the Illinois Chapter of Sierra Club ("Environmental Groups") submit these questions of the Illinois Environmental Protection Agency regarding proposed criteria for the Chicago Area Waterways System ("CAWS") and the Lower Des Plaines River ("LDPR").

1. For what parameters is the Chicago Sanitary and Ship Canal ("CSSC") currently listed as impaired? Does the Citgo Lemont Refinery discharge BOD or phosphorus?
2. At page 2 of your testimony you state that the CSSC "upstream of the Lemont Refinery exceeds 1,500 mg/L TDS during snow melt periods from de-icing practices throughout Northeast Illinois." How much of that 1,500 mg/L is chloride? What is the rest?
3. At page 2 you also describe difficulties that Citgo has had getting a variance approved by USEPA. How will the IEPA proposed changes to the criteria make things any worse as to chloride or TDS?
4. What dilution is present in the system between the Lemont Refinery and the UDIP? What dilution is present in the system between the Lemont Refinery and the general use waters in the Lower Dresden Island Pool that belongs at the I-55 Bridge?

5. What happens to the chloride and sulfate that the Lemont Refinery puts in the CSSC?
6. What happens to the mercury that the Lemont Refinery puts in the CSSC? Have you studied how far mercury can travel downstream from the point of discharge?
7. What mercury effluent limits is the Lemont Refinery currently subject to?
8. Is the UDIP currently listed as impaired by TDS? Should it be? Do you know what data is available for chloride, sulfate or mercury in the UDIP?
9. Is the Lower Dresden Island Pool listed as impaired for chloride, sulfate, or mercury? To your knowledge, should it be?
10. Would the Lemont Refinery have a problem meeting the Illinois General Use standard for sulfate?
11. On pages 3 and 4 of your testimony, you describe the very slow process of IEPA creation of TMDLs. Could that process be sped up if the entities concerned with chloride worked with the Agency to advance completion of a TMDL?
12. If the Board found that meeting the chloride standard could not be attained in the CSSC (and perhaps downstream waters affected by chloride) due to manmade causes for a number of years during which a variance might be issued, would that take care of the Lemont Refinery chloride problem ?
13. In your testimony you state that “in your permitting experience,” IEPA will impose a limit equal to the water quality standard on dischargers discharging to a 303(d) listed water. What is your understanding of why IEPA does that?
14. You state that no fishing is allowed in the Regulated Navigation Area at pages 4 to 5 of your testimony. Could the Board remove fish consumption as a designated use for that

area and adopt criteria accordingly? Would simply addressing the criteria designed to protect fish consumption in the Regulated Navigation Area take care of the Lemont Refinery's mercury issue?

15. At page 5 of your testimony, you state that chloride levels as high as 1,099 mg/L have been recorded at the Lemont Refinery intake. Would adoption of a winter acute criteria of 991 mg/L eliminate the chloride issue for the Lemont Refinery ?

16. At page 6, you suggest flow augmentation to dilute chloride concentrations during winter. Have you studied how this might affect flooding? Is MWRD's discretionary diversion to remain at current levels in the future?

17. At page 9 of your testimony, you suggest that imposition of a 500 mg/L effluent limit would require the Lemont Refinery to use mixing zones. Has distilling the high chloride wastewater stream been considered?

18. You cite various costs of reaching the potential end-of-pipe chloride and mercury limits at pages 10-11 of your testimony. What are the yearly net revenues of the Lemont Refinery?

19. At pages 12-3 of your testimony, you suggest an alternative regulatory approach. What obstacles are there to implementing your suggested approach under current Illinois laws and regulations and IEPA practice?

20. At page 13, you discuss best management practices being implemented by Citgo at Lemont. Is there any reason to believe that such practices could not prevent violations of protective chloride standards if they were diligently implemented in Northeast Illinois?

Dated: December 6, 2013

Respectfully submitted,

ENVIRONMENTAL LAW & POLICY CENTER

FRIENDS OF THE CHICAGO RIVER

NATURAL RESOURCES DEFENSE COUNCIL

OPENLANDS

PRAIRIE RIVERS NETWORK

SIERRA CLUB - ILLINOIS CHAPTER

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**ENVIRONMENTAL GROUPS' PRE-FILED QUESTIONS TO LIAL F. TISCHLER**

Environmental Law & Policy Center, Natural Resources Defense Council, Openlands, Friends of the Chicago River, Prairie Rivers Network, and the Illinois Chapter of Sierra Club (“Environmental Groups”) submit these questions of the Illinois Environmental Protection Agency regarding proposed criteria for the Chicago Area Waterways System (“CAWS”) and the Lower Des Plaines River (“LDPR”).

1. On page 3 of your testimony you state that Exxon Mobil discharges only 1,600 feet from the waters currently designated as “general use” in the Lower Dresden Island Pool. Are there any significant tributaries or other sources of dilution between the ExxonMobil discharge and the beginning of General Use waters at the I-55 bridge?

2. To your knowledge, do the General Use waters at the I-55 Bridge violate Illinois water quality standards for temperature, chloride or copper?

3. At page 3, you state that any changes to the existing designated use and applicable water quality criteria could have technical and economic impacts on Refinery operations. In what ways do you believe ExxonMobil is currently benefitting from the existing use designations? Do you have any idea how much in terms of dollars?

4. Is the point of your testimony regarding “Criteria for Use Subcategories” simply that it is permissible for Illinois to establish a separate designation and criteria for the UDIP as it now proposes to do?

5. You state at page 8 of your testimony that “USEPA’s interpretation of the discretion allowed to states in the development of numeric criteria are particularly relevant to the future UDIP criteria for temperature, chlorides, dissolved oxygen and potentially copper.” Is it relevant to ExxonMobil? Is water quality as to any of those parameters appreciably worse at the point of ExxonMobil’s discharge than it is 1600 feet downstream at the I-55 Bridge? What data does ExxonMobil have regarding dissolved oxygen levels at its point of discharge?

6. Does ExxonMobil discharge BOD or phosphorus?

7. Does ExxonMobil have a mixing zone for ammonia?

8. Specifically regarding chloride, is ExxonMobil now taking any steps to prevent causing or contributing to violations of water quality standards applicable at the I-55 Bridge?

9. At page 11 of your testimony, you suggest that as part of the IPCB proceedings, it could take the effects of Chicago’s deicing activities in the Chicago area into account. Just how would you want the Board to take deicing activities into account? Do you believe that a showing has been made in the record that chloride pollution caused by human caused conditions cannot be remedied? Have you studied whether the City of Chicago or other entities upstream of the ExxonMobil Refinery have adopted best management practices to minimize the amount of chloride necessary to keep streets safe in the winter?

10. You state at page 11 that states have adopted and USEPA has approved chloride criteria for specific surface water segments that have elevated chloride concentrations. Would any of these examples be appropriate for the Lower Des Plaines? Which of these standards do

you think would be protective of the existing uses? Are you aware whether these standards would be protective of fingernail clams? Were fingernail clams historically important in the Illinois River?

11. Have you studied the work of David Soucek regarding chloride toxicity? Are you aware of whether U.S. EPA is currently considering new criteria for chloride?

12. Regarding Use Attainability Analyses, do you agree that they are to determine what uses are attainable, which may include uses that are not currently being attained?

13. If so, is there any contradiction between the IPCB finding that a use is attainable even if it is not currently being attained? Do not the proposed USEPA regulations regarding variances recognize that a water body could satisfy one of the 131.10(g) factors for the period of a proposed variance, even if the use is attainable in the future?

14. Have you read the Board's Opinion and Order of November 21, 2013? Might that Opinion be properly interpreted as to the UDIP as stating that although the water is not currently attaining all of the Fishable/Swimmable uses, the Board has determined that such uses are attainable in the future? With regard to your testimony regarding variances, can the Board Opinion be interpreted as finding that some of the 131.10(g) factors may be present for several years in the future, but in the long run the UDIP should be able to attain Fishable/Swimmable uses?

15. You state at page 15 that "if upstream sources are controlled sufficiently to result in compliance with the water quality criteria in the UDIP upstream of existing point sources, it is probable that the existing point sources, including the Refinery, could install technically feasible and economically reasonable treatment and control technologies that in combination with mixing zones, would assure compliance with the applicable water quality criteria." If this is the case, is

there any reason that the IEPA proposed criteria are unattainable in the future? Assuming that the upstream sources were so controlled, would ExxonMobil continue to have any basis for seeking a variance or other regulatory relief?

16. At page 18, you ask that the Board reassess the applicability of the 40 CFR 131.10(g) factors to the UDIP. Do you continue to believe that the Board should do that in light of its November 21, 2013 Order?

17. You ask in your testimony at pages 18-19 that the Board assure that its adoption of Subpart D criteria “do not in any way affect the ability of dischargers to obtain compliance schedules.” How might the Board do that? Are there currently any obstacles to Illinois dischargers obtaining compliance schedules that comply with the Clean Water Act?

18. With regard to multi-discharger variances, you ask at page 21 that the Board adopt regulations that allow multi-discharger/waterbody water quality variances for constituents including temperature, mercury and chloride for the UDIP. Do you know of any obstacle in current Illinois regulations to such variances?

19. Have you studied the release data for mercury for the ExxonMobil Joliet Refinery? Can you explain the reasons for the apparent recent increase in mercury releases?

20. At page 21, you mention TMDLs as a possible regulatory mechanism. Why is a variance better than a TMDL? Is there any reason why Illinois cannot both allow a temporary variance and prepare a TMDL that will be implemented and eventually bring the water body into compliance with criteria?

21. Regarding chloride, you state at page 22 that “under current USEPA policy, if a water body is designated as impaired for a constituent, all renewed NPDES permits should be

based on an approved TMDL that will assure that the impairment will be removed.” Is there some reason that that should not be done for chloride with regard to the UDIP?

22. Regarding mercury, are you aware if the Illinois River and other waters downstream of the UDIP are impaired by mercury? Have any such mercury impairments affected ExxonMobil’s permits? Does ExxonMobil currently meet the mercury criteria at the end of the pipe?

23. On pages 27-28 of your testimony, you discuss provisional variances that have been obtained by Midwest Generation from temperature standards. You state that the variances do not address other downstream UDIP or LDIP dischargers. Does that mean that past ExxonMobil discharges during the period of provisional variances were illegal? Did ExxonMobil shut down during the period of those variances to avoid contributing additional heat to the water?

24. Have you spoken to Midwest Generation as to how it plans to meet criteria that may be adopted by the Board regarding temperature? To your knowledge, is there any reason why ExxonMobil could not file a joint petition for a variance with Midwest Generation?

25. Based on Exhibit B Figure 3, you claim that the IEPA proposal would apply temperature standards in the UDIP that are substantially more restrictive than general use standards downstream of I-55. Are you aware of the temperature criteria applicable to Midwest Generation at the I-55 Bridge? Have you considered what temperatures would be allowable in General Use waters under the provision requiring that the maximum temperature rise above natural be kept below 5 deg. F? Have you considered the other restrictions on temperatures in General Use waters provided in 35 Ill. Adm Code 302.211?

26. At page 31 of your testimony, you state that the IEPA proposal “is supposed to represent the ambient river temperatures in the absence of the point source thermal loading.” Is it

your understanding that this is true of the IEPA proposal for the whole year or only for part of the year?

27. Do you believe that winter temperatures in the UDIP are accurately reflected by the temperatures of the discharges of the MWRD sewage treatment plants? How do temperatures of discharges of sewage treatment plants typically relate to ambient temperatures in the winter ? Does ExxonMobil have data regarding non-summer temperatures at its discharge point that cause it to fear that there may be violations of the temperature standards in the vicinity of its plant if the IEPA proposal is adopted?

28. Is your understanding that the Yoder Report discussed at page 37 of your testimony did not consider the fish species actually present in the UDIP?

29. Have you studied the UDIP? What fish species that figured into the Yoder studies do you feel should not have been considered?

30. As you mention at page 36, Yoder used studies based on fish survival. In fact, are the IEPA proposed numbers for a modified use water based on short-term survival? Are you aware of instances in which the standard setting agency ignored fish avoidance temperatures? To your knowledge, what is USEPA's opinion on the relationship that temperature criteria should have to fish avoidance temperatures? Should IEPA ignore growth criteria of sport fish in setting criteria?

31. At pages 37-38, you quote USEPA language saying that a 95% protection level is acceptable because not all species need be protected at all times. Is not this language stated in the context of setting a toxicity final acute value for national 304a toxic criteria? Are the IEPA proposed maximum temperatures equivalent to a final acute value for toxic parameters? Are heat

criteria commonly set the same way as toxicity criteria? Are the survival rate figures used by Yoder based on using one-half of the LC-50 temperatures?

32. Is it acceptable to set maximum temperature criteria at levels at which 50% of a representative species that is or could be in the UDIP dies?

33. You recognize at page 38 that the IEPA criteria do not prohibit temperatures from ever going over the maximum daily temperature. What is your basis for believing that this allowance is not sufficient? Should the final rules allow temperatures to rise more than 3.6 deg. F above short term survival temperatures?

34. Are you asking the Board to reconsider and revise its current variance rules before completing this UAA proceeding?

Dated: December 6, 2013

Respectfully submitted,

ENVIRONMENTAL LAW & POLICY CENTER

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**ENVIRONMENTAL GROUPS' PRE-FILED QUESTIONS TO LARRY TYLER**

Environmental Law & Policy Center, Natural Resources Defense Council, Openlands, Friends of the Chicago River, Prairie Rivers Network, and the Illinois Chapter of Sierra Club ("Environmental Groups") submit these questions of the Illinois Environmental Protection Agency regarding proposed criteria for the Chicago Area Waterways System ("CAWS") and the Lower Des Plaines River ("LDPR").

1. On page 7 of your testimony you state that "treatment options for TDS in the wastewater were evaluated to be neither technologically feasible nor economically reasonable. What were all the treatment options evaluated? What criteria was used to decide if something was technologically feasible? What criteria were used to decide if an option was economically reasonable?
2. What approximately is the annual net revenue of the Lemont Refinery?
3. How was it "apparent that the TDS levels in the discharge from the Lemont Refinery were not associated with the level in the Ship Canal or at the I-55 Bridge?" (see testimony p.8)
4. What sampling was done at the I-55 Bridge? Is that data still available? Was anything else sampled at the Bridge as part of the sampling referenced at note 1 of your prefiled testimony?

5. On page 13 of your testimony, you suggest seasonal standards for chlorides. What would be the basis for seasonal standards? Is there evidence that aquatic life is less sensitive to chloride during some seasons than others?

Dated: December 6, 2013

Respectfully submitted,

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Environmental Law & Policy Center, Natural Resources Defense Council, Openlands, Friends of the Chicago River, Prairie Rivers Network, and the Illinois Chapter of Sierra Club ("Environmental Groups") submit these questions of the Illinois Environmental Protection Agency regarding proposed criteria for the Chicago Area Waterways System ("CAWS") and the Lower Des Plaines River ("LDPR").

1. At page 3 of your testimony, you discuss rotenone collections of fish. Is that the best way to determine what fish are capable of living in a water body?

2. On page 9 of your testimony, you refer to *Sphaerium*. Is that the Fingernail Clam? Are you aware of the work on Dr. Richard Sparks on the Fingernail Clam in the Illinois River? Was the Fingernail Clam historically present in the Illinois River and the Lower Des Plaines? Was it ecologically significant in those waters?

3. It appears that you used *Musculium* instead of the Fingernail Clam because the Fingernail Clam has not been found in the Chicago Sanitary and Ship Canal. How are *Musculium* similar to the Fingernail Clam? Does it use similar habitat and have similar breeding etc.? Are there significant differences between *Musculium* and the Fingernail Clam that enable *Musculium* to live in the CSSC ?

4. How does the GMAV for chloride of *Musculium* compare to that of the Fingernail Clam?
5. You calculate an acute value for the CSSC of 991 mg/L and a chronic value of 624 mg/L. How did sulfate and hardness figure into that calculation? What hardness and sulfate figures were used for the CSSC?
6. How do your acute and chronic figures compare with those used in Iowa? What factors cause your acute and chronic figures to be different than those that were calculated for Iowa waters?
7. Mr. Huff in his pre-filed testimony expresses concern that USEPA may move to lower its chronic criteria from 230 mg/L to a figure below 200 mg/L. (See Huff November 22, 2013 Pre-filed Testimony at 12.) Have you reviewed any of the science or concerns of USEPA that might cause it to change its chloride standard? Is any of that science or thinking that might lead USEPA to change its standard applicable to your approach to calculating a criteria for the CSSC?

Dated: December 6, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Albert Ettinger, hereby certify that I have served the attached ENVIRONMENTAL GROUPS' PRE-FILED QUESTIONS TO: LIAL F. TISCHLER, JAMES E. HUFF, P.E., ROGER KLOCEK and LARRY TYLER upon the below service list via the United States Mail, postage prepaid, in Chicago, Illinois on December 6, 2013.



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