

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PROPOSED AMENDMENTS TO:)
35 Ill. Adm. Code 302.102 and 302.208(g)) R18-032
WATER QUALITY STANDARDS)
FOR CHLORIDES)

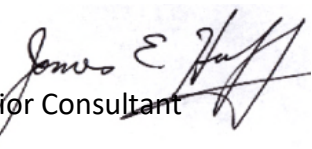
NOTICE OF FILING

TO: **Attached Service List**

PLEASE TAKE NOTICE that on June 26, 2019 I have filed with the Office of the Clerk of the Illinois Pollution Control Board Huff & Huff, Inc.'s **Motion for Extension of Time**, a copy of which is herewith served upon you.

Respectfully submitted,

Huff & Huff, Inc.

By: 
Senior Consultant

Dated: June 26, 2019

James E. Huff, P.E.
HUFF & HUFF, INC.
915 Harger Road, Suite 330
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James.huff@gza.com
630-684-4444

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PROPOSED AMENDMENTS TO:)
35 Ill. Adm. Code 302.102 and 302.208(g)) R18-032
WATER QUALITY STANDARDS)
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MOTION FOR EXTENSION OF TIME

Now comes Huff & Huff, Inc. by its Senior Consultant, James E. Huff, P.E., to move the Illinois Pollution Control Board for an Extension of Time for responding to the Pre-filed Questions. The Pollution Control Board Hearing Officer Order of May 16, 2019 requested responses to all questions by July 1, 2019. However, if additional time was needed, a motion requesting an extension could be requested. Huff & Huff states as follows:

- 1) Huff & Huff, Inc. filed an Amended Petition on March 14, 2019 to address a number of issues that were raised during the hearing held on January 23, 2019. The Amended Petition resulted in additional pre-filed questions and the participation by the Illinois Association of Wastewater Agencies (IAWA). These additional pre-filed questions have raised new concerns that cannot be addressed without additional toxicity testing.
- 2) The Board's Question 8 questions whether the Rainbow Trout data could be used in the derivation of a temperature variable. Elphick, et al. conducted the Rainbow Trout tests at 14°C, and this will be corrected in Table 1. Spehar's data were never published, so the temperature was assumed to be 12°C, the standard temperature for the Rainbow Trout toxicity tests. There is too little difference in the temperatures to meaningfully compute the temperature effects given the different laboratories and the very different sulfate concentrations utilized. Rainbow trout are an introduced species in Illinois, have no reproducing populations in Illinois waters, and must be stocked for anglers. Because they are not naturally present in Illinois, rainbow trout are a poor choice for a fish chloride toxicity model.
- 3) The Illinois EPA (Agency) was provided a copy of the work plan that called for testing the four most sensitive species to chloride exposure at 10°C. The only comment provided in response to the Agency review at the time was that we should evaluate more than two temperatures, which I agreed to do if the Agency could provide a funding source. Now in their second round of pre-filed questions, Question 4 questions why *Pimephales* was not selected for testing. This issue was not raised in the first round of questions by the Agency.
- 4) The Agency at Question 6 further questions why cold temperature testing with winter stoneflies or *Diamesa* was not conducted, again, when this was not raised during its review of the work plan.
- 5) The IAWA, which did not contribute to the funding of this cold temperature toxicity testing, has filed a significant number of questions that appear to be aimed at delaying any change in the chloride water quality standards. At Question 2, IAWA indicates that USEPA is to release additional data regarding chloride toxicity by the end of 2019. IAWA does not indicate whether USEPA will address temperature, which was the purpose of our work.

Electronic Filing: Received, Clerk's Office 6/26/2019

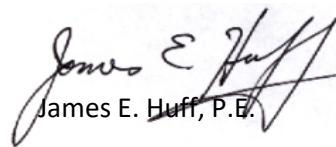
- 6) IAWA goes on to express concern over the proposed summer chloride water quality standards, identifying ion exchange technologies, with brine regeneration contributing chlorides to the POTW effluents. There are alternatives to ion exchange, reverse osmosis being the primary one for water softening. I am aware of two communities in Illinois that currently exceed the existing chloride water quality standard from ion exchange regeneration, Frankfort and Crystal Lake. Flow augmentation during low flow is a viable option until the ion exchange technology is replaced in these communities.

Given the above significant issues, Huff & Huff, Inc. respectfully requests an extension of time until May 1, 2020 for responding to the pre-filed questions to accomplish the following:

- 1) Attempt to raise additional funds to conduct cold temperature toxicity testing of the *Pimephales* and winter stoneflies, and to respond to the significant number of questions that require further compilation and computation of data.
- 2) The added time will allow for the USEPA to publish additional chloride toxicity data that IAWA indicates will be available by the end of 2019.
- 3) IAWA at Question 4 indicates that several (unidentified) researchers are actively studying chloride toxicity, and therefore IAWA believes we are premature. This extension of time will allow for additional research to be available, which we will incorporate as appropriate. However, it is not clear at what point IAWA believes there will be sufficient toxicity data to proceed. The amended petition was clear that the proposed standard could be viewed as an interim standard and could be reviewed as part of the triannual standards review.
- 4) Once the additional toxicity testing is completed, we will re-calculate the water quality algorithm and submit the toxicity testing and calculations to USEPA for comments.

Wherefore Huff & Huff respectfully requests the Illinois Pollution Control Board grant an Extension of Time to file for the reasons set forth herein.

Respectfully submitted,
Huff & Huff, Inc.



James E. Huff, P.E.

Dated: June 26,2019

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HUFF & HUFF, INC.
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CERTIFICATE OF SERVICE

I, James E. Huff, the undersigned, on oath state the following: That I have served the attached **MOTION FOR EXTENSION OF TIME**, via electronic mail upon:

Illinois Pollution Control Board*
Interested Party
Don Brown - Clerk of the Board
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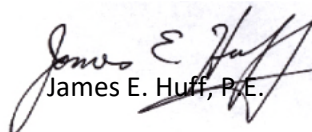
That the number of pages in the email transmission is 4 pages .

That the email transmission took place before 5:00 p.m. on the date of June 26, 2019.

HUFF & HUFF, INC.

Dated: June 26, 2019

By:


James E. Huff, P.E.