

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

VILLAGE OF HOMEWOOD, HOMEWOOD	)	
ILLINOIS, VILLAGE OF ORLAND PARK,	)	
ORLAND PARK ILLINOIS, VILLAGE OF	)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,	)	
VILLAGE OF TINLEY PARK, TINLEY PARK	)	
ILLINOIS, EXXONMOBIL OIL	)	
CORPORATION, VILLAGE OF WILMETTE,	)	
WILMETTE ILLINOIS, CITY OF COUNTRY	)	
CLUB HILLS, COUNTRY CLUB HILLS	)	
ILLINOIS, NORAMCO-CHICAGO, INC.,	)	
FLINT HILLS RESOURCES JOLIET LLC,	)	
CITY OF EVANSTON, EVANSTON ILLINOIS,	)	
VILLAGE OF SKOKIE, SKOKIE ILLINOIS,	)	PCB 16-14 (Homewood)
ILLINOIS DEPARTMENT OF	)	PCB 16-15 (Orland Park)
TRANSPORTATION, METROPOLITAN	)	PCB 16-16 (Midlothian)
WATER RECLAMATION DISTRICT OF	)	PCB 16-17 (Tinley Park)
GREATER CHICAGO, VILLAGE OF	)	PCB 16-18 (ExxonMobil)
RICHTON PARK, RICHTON PARK ILLINOIS,	)	PCB 16-20 (Wilmette)
VILLAGE OF LINCOLNWOOD,	)	PCB 16-21 (Country Club Hills)
LINCOLNWOOD ILLINOIS, CITY OF OAK	)	PCB 16-22 (Noramco-Chicago)
FOREST, OAK FOREST ILLINOIS, VILLAGE	)	PCB 16-23 (Flint Hills Resources)
OF LYNWOOD, LYNWOOD ILLINOIS,	)	PCB 16-25 (Evanston)
CITGO HOLDINGS, INC., VILLAGE OF NEW	)	PCB 16-26 (Skokie)
LENOX, NEW LENOX ILLINOIS, CITY OF	)	PCB 16-27 (IDOT)
LOCKPORT, LOCKPORT ILLINOIS,	)	PCB 16-29 (MWRDGC)
CATERPILLAR, INC., CITY OF CREST HILL,	)	PCB 16-30 (Richton Park)
CREST HILL ILLINOIS, CITY OF JOLIET,	)	PCB 16-31 (Lincolnwood)
JOLIET ILLINOIS, MORTON SALT, INC.,	)	PCB 16-33 (Oak Forest)
CITY OF PALOS HEIGHTS, PALOS HEIGHTS	)	PCB 19-7 (Village of Lynwood)
ILLINOIS, VILLAGE OF ROMEOVILLE,	)	PCB 19-8 (Citgo Holdings)
ROMEOVILLE ILLINOIS, IMTT ILLINOIS	)	PCB 19-9 (New Lenox)
LLC, STEPAN CO., VILLAGE OF PARK	)	PCB 19-10 (Lockport)
FOREST, PARK FOREST ILLINOIS, OZINGA	)	PCB 19-11 (Caterpillar)
READY MIX CONCRETE, INC., OZINGA	)	PCB 19-12 (Crest Hill)
MATERIALS, INC., MIDWEST MARINE	)	PCB 19-13 (Joliet)
TERMINALS LLC, VILLAGE OF MOKENA,	)	PCB 19-14 (Morton Salt)
MOKENA ILLINOIS, VILLAGE OF OAK	)	PCB 19-15 (Palos Heights)
LAWN, OAK LAWN ILLINOIS, VILLAGE OF	)	PCB 19-16 (Romeoville)
DOTON, DOTON ILLINOIS, VILLAGE OF	)	PCB 19-17 (IMTT Illinois)
GLENWOOD, GLENWOOD ILLINOIS,	)	PCB 19-18 (Stepan)
VILLAGE OF MORTON GROVE, MORTON	)	PCB 19-19 (Park Forest)
GROVE ILLINOIS, VILLAGE OF LANSING,	)	PCB 19-20 (Ozinga Ready Mix)
LANSING ILLINOIS, VILLAGE OF	)	PCB 19-21 (Ozinga Materials)
FRANKFORT, FRANKFORT ILLINOIS,	)	PCB 19-22 (Midwest Marine)

VILLAGE OF WINNETKA, WINNETKA	)	PCB 19-23 (Mokena)
ILLINOIS, VILLAGE OF LA GRANGE, LA	)	PCB 19-24 (Oak Lawn)
GRANGE ILLINOIS, VILLAGE OF	)	PCB 19-25 (Dolton)
CHANNAHON, CHANNAHON ILLINOIS,	)	PCB 19-26 (Glenwood)
COOK COUNTY DEPARTMENT OF	)	PCB 19-27 (Morton Grove)
TRANSPORTATION AND HIGHWAYS,	)	PCB 19-28 (Lansing)
VILLAGE OF NILES, NILES ILLINOIS,	)	PCB 19-29 (Frankfort)
SKYWAY CONCESSION COMPANY LLC,	)	PCB 19-30 (Winnetka)
VILLAGE OF ELWOOD, ELWOOD ILLINOIS,	)	PCB 19-31 (La Grange)
CITY OF CHICAGO, CHICAGO ILLINOIS,	)	PCB 19-33 (Channahon)
VILLAGE OF CRESTWOOD, CRESTWOOD	)	PCB 19-34 (CCDTH)
ILLINOIS and VILLAGE OF RIVERSIDE,	)	PCB 19-35 (Niles)
RIVERSIDE ILLINOIS	)	PCB 19-36 (Skyway)
	)	PCB 19-37 (Elwood)
Petitioners,	)	PCB 19-38 (Chicago)
	)	PCB 19-40 (Crestwood)
v.	)	PCB 19-48 (Riverside)
	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Time-Limited Water Quality
AGENCY,	)	Standard)
	)	(Consolidated)
Respondent.	)	

**PETITIONER CITY OF PALOS HEIGHTS CONCURRENCE AND ADOPTION  
OF POST-HEARING BRIEF OF METROPOLITAN WATER  
RECLAMATION DISTRICT OF GREATER CHICAGO**

Now comes Petitioner, City of Palos Heights (“Palos Heights”), by and through its Attorney, Dennis G Walsh of Klein, Thorpe and Jenkins, Ltd and, pursuant to Orders entered herein by Hearing Officer Bradley P. Halloran providing for the parties, if they so choose, to file post-hearing briefs in this matter, states as follows:

Palos Heights has reviewed the Post-Hearing Brief of the Metropolitan Water Reclamation District of Greater Chicago (“MWRDGC”)(PCB 16-29) and Palos Heights hereby concurs with and adopts as and for its own the Post-Hearing Brief filed by MWRDGC. Palos Heights states that the Post-Hearing Brief incorporates the arguments and positions endorsed and advocated by Palos Heights, unless they do not apply to the individual circumstances of Palos Heights, and believes that the position as presented by MWRDGC is in the best interest of all

parties.

Palos Heights further indicates that it has discovered that in its *Individual Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard ("TLWOS") for the Defined Chicago Area Water System/ Des Plaines River Watershed*, filed before the Illinois Pollution Control Board on July 25, 2018, there is a scrivener's error on Page 2, Item 7. The "Salt Storage Facility" item was erroneously selected. "Salt Storage Facility" should not be selected; "MS4" should be the only category checked. Palos Heights asks that its submission be corrected.

Respectfully submitted,

CITY OF PALOS HEIGHTS,

By: /s/ Dennis G. Walsh  
One of Petitioner's Attorneys

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Petitioners,	)	PCB 19-38 (Chicago)
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	)	
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Time-Limited Water Quality
AGENCY,	)	Standard)
	)	(Consolidated)
Respondent.	)	

**NOTICE OF FILING**

To: **(SEE PERSONS ON ATTACHED SERVICE LIST)**

PLEASE TAKE NOTICE that on April 21, 2020, I electronically filed with the Office of the Clerk of the Pollution Control Board PETITIONER CITY OF PALOS HEIGHTS' CONCURRENCE AND ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO on behalf of Petitioner, City of Palos Heights, a copy of which is herewith served upon you.

Respectfully submitted,

CITY OF PALOS HEIGHTS  
/s/ Dennis G. Walsh  
 One of Petitioner's Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney certified, under the penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing PETITIONER CITY OF PALOS HEIGHTS' CONCURRENCE AND ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO to be served via email transmittal from 20 N. Wacker Drive, Suite 1660, Chicago, Illinois 60606 on the 21<sup>st</sup> day of April, 2020 to the individuals listed on the attached service list.

CITY OF PALOS HEIGHTS,

By: /s/ Dennis G. Walsh  
One of Petitioner's Attorneys

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