# 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, JOLIET ILLINOIS, MORTON SALT, INC.,  | ) | PCB 16-31 (Lincolnwood)<br>PCB 16-33 (Oak Forest)      |
| CITY OF PALOS HEIGHTS, PALOS HEIGHTS  | ) | PCB 19-7 (Village of Lynwood)                          |
| ILLINOIS, VILLAGE OF ROMEOVILLE,  | ) | PCB 19-7 (vinage of Lyhwood) PCB 19-8 (Citgo Holdings) |
| ROMEOVILLE ILLINOIS, IMTT ILLINOIS  | ) | PCB 19-8 (Citgo Holdings) PCB 19-9 (New Lenox)         |
| LLC, STEPAN CO., VILLAGE OF PARK  | ) | PCB 19-9 (New Lenox)                                   |
| FOREST, PARK FOREST ILLINOIS, OZINGA  | ) | PCB 19-10 (Edekport) PCB 19-11 (Caterpillar)           |
| READY MIX CONCRETE, INC., OZINGA  | ) | PCB 19-11 (Caterphiar)                                 |
| 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.                         | ) |                             |
|                                     |   |                             |

### **NOTICE OF FILING**

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

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

Respectfully submitted,

CITY OF CHICAGO

By: /s/Jared Policicchio

Jared Policicchio Supervising Assistant Corporation Counsel City of Chicago, Department of Law 30 North LaSalle Street, Suite 1400 Chicago, Illinois 60602

Ph: 312-744-1438 Fax: 312-742-3832

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## 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         | ) |                                   |
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| 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)         |
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| READY MIX CONCRETE, INC., OZINGA       | ) | PCB 19-12 (Crest Hill)            |
| MATERIALS, INC., MIDWEST MARINE        | ) | PCB 19-13 (Joliet)                |
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| LANSING ILLINOIS, VILLAGE OF           | ) | PCB 19-21 (Ozinga Materials)      |

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|                                     | ) | 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 CHICAGO'S CONCURRENCE AND ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO

Now comes Petitioner, City of Chicago (the "City"), by and through the undersigned as one of its attorneys, and pursuant to Orders entered by Hearing Officer Bradley P. Halloran in which the parties were directed, if they choose so, to file post-hearing briefs in this matter, states as follows:

The City has reviewed the Post-Hearing Brief filed by the Metropolitan Water Reclamation District of Greater Chicago ("MWRD") (PCB 16-29) and the City concurs and adopts the Post-Hearing Brief filed by MWRD as its own The City states that the Post-Hearing Brief incorporates the arguments and positions endorsed and advocated by the City, unless they do not apply to the individual circumstances of the City, and believes that the position as presented by MWRD is in

the best interest of all parties.

Respectfully submitted,

CITY OF CHICAGO,

By: /s/Jared Policicchio

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**CERTIFICATE OF SERVICE** 

I, Jared Policicchio, herein certify that I have served a copy of the foregoing PETITIONER CITY OF CHICAGO'S CONCURRENCE AND ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO, upon persons listed on the Service List attached to the Notice of Filing by sending an email from my email account to the email addresses designated in the list included in the Notice of Filing by an e-mail transmission on April 21, 2020.

Respectfully submitted,

CITY OF CHICAGO,

By: /s/Jared Policicchio

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