

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

INEOS JOLIET, LLC,	)	
Petitioners,	)	
v.	)	
	)	PCB 16-24
ILLINOIS ENVIRONMENTAL	)	(Time-Limited Water Quality Standard)
PROTECTION AGENCY	)	
Respondent.	)	

NOTICE OF FILING

TO: Don Brown	Brad Halloran
Clerk of the Board	Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630	60 E. Van Buren Street, Suite 630
Chicago, Illinois 60605	Chicago, Illinois 60605
(VIA ELECTRONIC MAIL)	(VIA ELECTRONIC MAIL)

(SEE PERSONS ON ATTACHED SERVICE LIST)

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **FOURTH MOTION TO STAY PROCEEDINGS**, a copy of which is herewith served upon you.

Date: July 31, 2025

Respectfully submitted,

INEOS JOLIET, LLC

By: /s/ Michael P. Murphy
One of its Attorneys

Michael P. Murphy
HEPLERBROOM, LLC
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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

INEOS JOLIET, LLC,	)	
Petitioner,	)	
v.	)	PCB 16-24
	)	(Time-Limited Water Quality Standard)
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY	)	
Respondent.	)	

FOURTH MOTION TO STAY PROCEEDINGS

Pursuant to 35 Ill. Adm. Code 101.514, INEOS Joliet, LLC (“INEOS” or “Petitioner”), by its attorneys, HEPLERBROOM, LLC, respectfully requests that the Illinois Pollution Control Board (“Board”), by and through the Hearing Officer, enter an order staying this proceeding until INEOS is protected by the Alternative Thermal Effluent Limitations (“ATELs”) granted by the Board. In support of this motion, INEOS states as follows:

1. On June 26, 2025, an Opinion and Order of the Board was filed in PCB 23-135 granting the proposed ATELs to INEOS and directing Illinois EPA to include the ATELs in the facility’s NPDES Permit.

2. This matter remains stayed pursuant to the Hearing Officer Order entered on December 21, 2021, granting the Third Motion to Stay Proceeding. A stay was granted “until the Board reaches a decision on INEOS’ ATEL petition or until the Board orders otherwise.”

3. The June 26, 2025, Opinion and Order of the Board is not final until July 31, 2025, and INEOS moves to continue the stay before the decision is final.

4. NPDES Permit No. IL 0001643 for the Facility expires on Sept. 30, 2025; however, INEOS timely submitted its NPDES Permit renewal application. The renewal application remains pending with Illinois EPA.

5. The ATELs are expected to be incorporated into the NPDES Permit as part of

the renewal as directed by the Board, but INEOS will not have the benefit or protection of the ATELS until the permit is issued and effective.

6. Until the renewed NPDES Permit containing the ATELS is issued and becomes effective, this matter should be stayed, and the stay of the temperature water quality standard as to INEOS should continue to remain in effect during the stay of these proceedings.

7. INEOS will submit status reports during the new stay period as directed by the Hearing Officer.

8. Petitioner has consulted with counsel for Illinois EPA, who confirmed that Illinois EPA does not object to this motion.

WHEREFORE, INEOS Joliet, LLC respectfully requests the Illinois Pollution Control Board, by and through the Hearing Officer, to stay proceedings in this matter until INEOS Joliet, LLC's renewed NPDES Permit containing the ATELS is issued and becomes effective, with the stay of the temperature water quality standard as to INEOS remaining in effect during the stay of these proceedings.

Respectfully submitted,

INEOS JOLIET, LLC

Dated: July 31, 2025

By: /s/ Michael P. Murphy
One of its attorneys

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CERTIFICATE OF SERVICE

I, the undersigned, on oath state the following:

That I have served the attached the **FOURTH MOTION TO STAY PROCEEDINGS** via electronic mail upon:

Don Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren Street, Suite 630
Chicago, Illinois 60605
Don.Brown@illinois.gov

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Hearing Officer
Illinois Pollution Control Board
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That my email address is: Michael.Murphy@heplerbroom.com

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 July 31, 2025.

/s/ Michael P. Murphy
One of its Attorneys

Date: July 31, 2025