ILLINOIS POLLUTION CONTROL BOARD
July 13, 2000

CITY OF ROCK ISLAND,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 00-73
	)	(Permit Appeal – NPDES)
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

ROY M. HARSCH, OF GARDNER, CARTON & DOUGLAS, APPEARED ON BEHALF OF PETITIONER; and

RICHARD C. WARRINGTON, JR., OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, APPEARED ON BEHALF OF RESPONDENT.

OPINION AND ORDER OF THE BOARD (by E.Z. Kezelis):

This matter is before the Board on an October 19, 1999 petition for appeal of a National Pollutant Discharge Elimination System (NPDES) permit issued to the City of Rock Island (Rock Island) for a sewage treatment plant by the Illinois Environmental Protection Agency (Agency). Specifically, Rock Island appeals three conditions of its NPDES permit: (1) the requirement that Rock Island treat a design maximum flow of 16 million gallons per day at the plant before utilizing a combined sewer overflow known as Outfall 001A; (2) the designation of Outfall 007 as a sanitary sewer outfall; and (3) the application of new chlorine residual limitations for two new outfalls.

A hearing was held before Board Hearing Officer John Knittle, on March 22 and 23, 2000. The hearing was held in conjunction with a hearing in the related variance proceeding pending in City of Rock Island v. Illinois Environmental Protection Agency, PCB 98-164. That variance proceeding is also decided today in a separate opinion and order. City of Rock Island v. Illinois Environmental Protection Agency (July 13, 2000), PCB 98-164.

The Board's responsibility in this matter arises from the Illinois Environmental Protection Act (Act) (415 ILCS 5/1 *et seq*. (1998)). Section 40(a)(1) of the Act provides that:

> If the Agency refuses to grant or grants with conditions a permit under Section 39 of this Act, the applicant may, within 35 days, petition for a hearing before the Board to contest the decision of the Agency. 415 ILCS 5/40(a)(1) (1998).

When faced with an appeal of conditions imposed by a permit, the Board must determine whether the petitioner proves that the permit condition is unnecessary to accomplish the purposes of the Act and Board regulations. Browning-Ferris Industries of Illinois, Inc. v. IPCB, 179 Ill. App. 3d 598, 534 N.E.2d 616 (2nd Dist. 1989). If the condition is found to be arbitrary and unnecessary, it must be deleted from the permit. *Id*.

For the reasons presented herein, the Board finds that Rock Island has met its burden of proof and accordingly, the Board will remand each of the three conditions on appeal to the Agency for issuance of a revised NPDES permit consistent with this opinion and order.

BACKGROUND

Rock Island is a municipality located in northwestern Illinois on the Mississippi and Rock Rivers, 186 miles west of Chicago. Rock Island owns and operates its own sewer system and treatment plants. Rock Island is served by two sewage treatment plants, but only the main treatment plant (Plant) is the subject of this permit appeal.

The Plant has an 8 million gallon per day (MGD) design average flow capacity. The Plant, as currently constructed, consists of two parallel grit removal chambers, eight primary settling tanks, a complete mix-activated sludge process, two secondary clarifiers, and chlorinating facilities. While treated effluent is discharged into the Mississippi River, flows in excess of what can practically be treated are bypassed and discharged through overflow outfalls to the Mississippi River, Sylvan Slough, and Blackhawk Creek.

On March 24, 1998, Rock Island applied to the Agency for reissuance of its existing NPDES permit. Pet. at 1. Rock Island must have an NPDES permit in order for it to discharge from the Plant to the Mississippi River, Sylvan Slough, and Blackhawk Creek. *Id*. A final NPDES permit, with the conditions challenged herein, was issued to Rock Island by the Agency on September 14, 1999. Rock Island's timely appeal was filed on October 19, 1999. The Agency's administrative record was filed on March 6, 2000.[1]

A hearing was held on March 22 and 23, 2000, in Rock Island, Illinois. Rock Island presented testimony from three witnesses: Robert Hawes, Thomas McSwiggin, and James Huff. The Agency tendered one witness, Paul Rust, to Rock Island for questioning. The Agency also offered one exhibit into evidence. The parties stipulated at the hearing that the testimony and exhibits from the related proceeding in City of Rock Island v. IEPA, PCB 98-164, would be incorporated by reference into the record in this permit appeal. A number of other factual

[1] Rock Island's petition will be referred to as "Pet. at __." The Agency's record will be referred to as "Ag. Rec. at __." The hearing transcript will be referred to "Tr. at __." The variance hearing transcript (PCB 98-164) will be referred to as "Var. Tr. at __." Rock Island's posthearing briefs will be referred to as "Pet. Br. at __" and "Pet. Reply Br. at __." The Agency's posthearing brief will be referred to as "Ag. Br. at __."

stipulations were also made on the record at hearing. The parties submitted post hearing briefs, and the matter was fully briefed as of June 16, 2000.

BURDEN OF PROOF

A petition for review of permit conditions is authorized by Section 40(a)(1) of the Act (415 ILCS 5/40(a)(1) (1998)) and Section 105.102(a) of the Board's procedural rules (35 Ill. Adm. Code 105.102(a)). The Board has long held that in permit appeals, the burden of proof rests with the petitioner challenging the permit. Village of Fox River Grove v. IEPA (December 18, 1997), PCB 97-156. The standard of review was enunciated in Browning-Ferris Industries of Illinois, Inc. v. PCB, 179 Ill. App. 3d 598, 534 N.E. 2d 616 (2nd Dist. 1989), where the appellate court held that a permit condition that is not necessary to accomplish the purposes of the Act or Board regulations is arbitrary and unnecessary and must be deleted from the permit.

ISSUES ON APPEAL

Rock Island has appealed from the three following conditions as set forth in NPDES Permit No. IL0030783: (1) with regard to combined sewer overflows from Outfalls 001A, excess flow facilities shall not be utilized until the main treatment facility is treating 16 MGD; (2) with regard to special condition 11, Outfall 007 is classified as a sanitary sewer overflow from which discharge is prohibited; and (3) with regard to Outfalls 011 and 012, the chlorine residual limit was set at .75 mg/L. Each of these three conditions is discussed below.

Condition One: Required Treatment of 16 MGD

Origin of 16 MGD figure.

Rock Island objects to the permit condition that it treat 16 MGD before utilizing the combined sewer overflow (CSO) bypass at Outfalls 001A. Pet. at 2. The previous NPDES permits issued to Rock Island by the Agency did not contain this requirement. *Id*. Rather, previous NPDES permits have required Rock Island to "treat maximum practical flow" prior to utilizing the CSO bypass. Pet. at 2.

In the 1960's, when Rock Island's Plant was originally designed and constructed, it had an 8 MGD design average flow (DAF) capacity. Tr. at 104-05. It was the accepted and normal practice at that time to design and permit sewage treatment plants based only on the DAF. Var. Tr. at 66. In fact, it was not until 1980 that design standards focusing more on maximum design flow were adopted. Var. Tr. at 67. Accordingly, prior to 1980, the then existing rule of thumb employed by the Illinois Sanitary Water Board and, consequently the Agency, was to multiply the DAF by two in order to calculate the DMF. Var. Tr. at 68. Because Rock Island's DAF was 8 MGD, the calculation resulted in a designation of DMF of 16 MGD. Var. Tr. at 72. This designation had nothing to do with a facility's actual capacity to handle the designated DMF. *Id*.

In 1985, Rock Island and the Agency filed a joint petition for exception from the requirements of 35 Ill. Adm. Code 306.305(a) and (b). See City of Rock Island v. IEPA, PCB 98-164, Petition for Variance, Exhibit 1. The purpose of their petition was to allow Rock Island to construct and operate CSO transport and treatment facilities. *Id*. In an order dated May 9, 1986, the Board granted the requested exception. *In re* The Joint Petition of the City of Rock Island and the IEPA for Exception to the Combined Sewer Overflow Regulations (May 9, 1986), PCB 85-214), slip. op. at 8. In so doing, the Board incorporated into its order a portion of the joint petition for exception that designated Rock Island's Plant as having a DMF of 16 MGD. *Id*. at 4. Thus, from that point forward, Rock Island was obligated pursuant to the exception order to treat a DMF of 16 MGD.

Permit Appeal Arguments.

As previously stated, Rock Island seeks to have the permit condition altered to allow treatment of "maximum practical flow" before utilizing the CSO bypass. Rock Island maintains that the Plant is currently not physically capable of handling flows of 16 MGD without experiencing a washout of solids. Var. Tr. at 55. The washout of solids is not desirable because it causes a treatment plant to lose solids necessary for biological treatment of wastes; treatment capabilities can be lost for two or three days. Var. Tr. at 75. Accordingly, requiring treatment of 16 MGD before utilizing the CSO bypass may result in a solids washout from the plant that would not only adversely impact the receiving stream, but would also impair the Plant's ability to treat incoming wastewater.

Rock Island introduced evidence through Agency employee Thomas McSwiggin, that the standard NPDES permit language normally used by the Agency requires treatment of only the "maximum practical flow" before utilizing a CSO bypass. Var. Tr. at 72-73. The Agency requires treatment of "maximum practical flow" for even those facilities constructed after 1980 that were specifically designed and constructed to meet the designated DMF. Var. Tr. at 73. McSwiggin testified that Rock Island's inability to treat flows up to its DMF and still comply with permit effluent limitations is a common problem. Var. Tr. at 73. According to McSwiggin, the purpose of the Agency's policy to require treatment of only "maximum practical flow" is twofold; to prevent a washout of solids and to recognize the historic inability of facilities to accurately characterize the DMF. Var. Tr. at 68-9, 74-5.

In its September 14, 1999 letter, the Agency explained that the United States Environmental Protection Agency (USEPA) was the source of the condition that Rock Island treat 16 MGD before utilizing the CSO bypass. Ag. Rec. at 1. The Agency includes in its record a February 23, 1999 letter from USEPA, in which USEPA recognized that "maximum practical flow" is not defined in the NPDES permit and therefore requested inclusion of the "16 MGD" language. Ag. Rec. at 90. In support of this condition, the Agency argues that Rock Island's Plant has always had a designated DMF of 16 MGD that has never, until now, been challenged by Rock Island. Ag. Br. at 2. Additionally, the Agency points to a federal regulation, 40 C.F.R. 122.41(c), that is a standard condition in Illinois NPDES permits. It

provides:

> *Need to halt or reduce activity not a defense*. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. Ag. Br. at 3-4.

The Agency argues that because Board regulations (35 Ill. Adm. Code 309.146(c)) require permit conditions at least as stringent as applicable federal regulations, the 16 MGD treatment requirement is justified. Ag. Br. at 3.

The Board finds that Rock Island has carried its burden with regard to this first challenged condition, and that the condition requiring Rock Island to treat a DMF of 16 MGD before utilizing its CSO bypass is arbitrary. Rock Island has demonstrated that the requirement that it treat 16 MGD before discharging through its CSO is not necessary to accomplish the purposes of the Act or Board regulations. Rock Island has also demonstrated that compliance with this requirement would result in a washout of solids that would adversely impact its ability to adequately treat waste. The terms imposed by the Agency in NPDES Permit No. IL0030783 do not protect the environment, but rather threaten a negative environmental impact if compliance is required.

Based on the information in the record, most other wastewater treatment facilities in Illinois are required to only treat the "maximum practical flow." Var. Tr. at 72-73. Furthermore, McSwiggin testified that the Agency is aware that the current configuration of Rock Island's Plant is that of only a 12 MGD DMF. Var. Tr. at 70. Therefore, requiring Rock Island to treat a DMF of 16 MGD before utilizing its CSO bypass, in the absence of a compelling reason, is an arbitrary and unnecessary condition. Accordingly, the Board finds that this condition must be remanded to the Agency for revision consistent with this opinion and order.

Condition Two: Outfall 007 as a Sanitary Sewer Overflow and Purported Jeopardy of Grant Funds

Rock Island appeals the designation of Outfall 007 as a sanitary sewer outfall. Discharges are prohibited from sewers classified as sanitary sewer outfalls. See 35 Ill. Adm. Code 306.304. Rock Island seeks to have Outfall 007 reclassified as a CSO because it was originally designed and constructed as a CSO, and because both Rock Island and the Agency have treated it as a CSO in the course of past and ongoing improvements to the system.

A sanitary sewer overflow is defined as:

> "Sanitary Sewer" means a sewer that carries wastewater together with incidental land runoff. 35 Ill. Adm. Code 301.375.

A CSO is defined as:

> "Combined Sewer" means a sewer designed and constructed to receive both wastewater and land runoff. 35 Ill. Adm. Code 301.255.

Land runoff is further defined as:

> "Land Runoff" means water reaching the waters of the State as runoff resulting from precipitation. 35 Ill. Adm. Code 301.305.

Outfall 007 accepts water from residential footing drains, sump pumps, and roof drains (Pet. Br. at 7), all of which are considered sources of land runoff and all of which contribute more than incidentally to the sewer flow (Pet. Reply Br. at 4; Tr. at 18). Rock Island argues that because Outfall 007 was originally designed and constructed as a combined sewer as well as the significant contributions to the sewer from more than incidental land runoff, the permit designation of it as a sanitary sewer is inconsistent with the regulatory definitions. Pet. Reply Br. at 4.

Rock Island also disagrees with the Agency's assertion that Outfall 007 was treated as a sanitary sewer in the course of Rock Island's Municipal Compliance Plan. Pet. Reply Br. at 4-5. In fact, Rock Island alleges that in the course of making improvements to eliminate the overflows from Outfall 007, the Agency instructed it to convey the maximum flow possible (first flush and 10 times dry weather flow) to the proposed new lift station. Tr. at 20; Pet. Br. at 8. According to Rock Island, the "first flush and 10 times dry weather flow" is a reference to rules that apply to CSO's and not to sanitary sewers. Pet. Br. at 8; Tr. at 21.

In addition, Rock Island maintains that it never committed to totally separate sewer systems, and that even after the partial separation was completed, the sewers tributary to Outfall 007 still carried a significant amount of storm water. Pet. Rep. Br. at 5. Nevertheless, the parties agree that recent and continuing improvements to Rock Island's system should eliminate the overflow from Outfall 007. Pet. Reply Br. at 6; Ag. Br. at 5; Tr. at 19.

In response, the Agency first argues that Outfall 007 does not satisfy the technical definitions of either a sanitary sewer overflow or a CSO. The Agency maintains that Outfall 007 has historically been treated by both the Agency and Rock Island as a sanitary sewer. Ag. Br. at 4-5. In its posthearing brief, the Agency states that some of the sewers tributary to Outfall 007 were originally designed and constructed as combined sewers and that the amount of stormwater now carried by these sewers is more than incidental. Ag. Br. at 4. However, the Agency maintains that both it and Rock Island treated Outfall 007 as a sanitary sewer pursuant to Rock Island's Municipal Compliance Plan, which was approved by the Agency in 1986. Ag. Br. at 4; Ag. Rec. at 278-79.

Second, the only ramifications specifically identified by the Agency in reclassifying Outfall 007 as a CSO, are those involving unspecified grant money purportedly disbursed to Rock Island in connection with work on its Municipal Compliance Plan. Ag. Rec. at 1. These ramifications, however, have no bearing on whether the requested change would result in a violation of the Act or Board regulations. Furthermore, from testimony presented at hearing, it appears that the Agency's own grant section concluded that reclassification would not impact grant money. Tr. at 44. During examination by the Agency's attorney, Agency witness Paul Rust testified as follows:

> Q Did you inquire with anyone of our grant - - of the agency grant section as to whether this [reclassification of Outfall 007] was a problem or not?
>
> ***
>
> A Yes. I did confer with our grant section information - - or infrastructure financial existent section currently.
>
> Q And their answer was?
>
> A Their answer was that it would not. The conversion of the storage basins to excess flow would not jeopardize the grant money.
>
> Q Nonetheless, the permit had the language saying that it would?
>
> A The letter you are referring to said that an agency decision to reclassify 007 as a combined sewer overflow might.
>
> Q And did you confer with anyone else in the agency regarding the reclassification becoming a grant problem?
>
> A No, I did not. I only talked to the unit manager, Dean Studer.
>
> Q Did you make any written memorandum of these conversations?
>
> A No.

Tr. at 42-45.

The Board finds, based on the record before it, that the classification of Outfall 007 as a sanitary sewer is not necessary to accomplish the purposes of the Act and Board regulations. Outfall 007 satisfies the technical definition of a CSO and accordingly, should be reclassified as a CSO. With this reclassification, Rock Island would be allowed to discharge from Outfall 007 under those circumstances set forth in 35 Ill. Adm. Code 306.305, which require less stringent treatment than wastewater from sanitary sewers. It is uncontroverted that the sewers tributary to Outfall 007 currently carry both wastewater and more than incidental land runoff. Tr. at 11.

It is further uncontroverted that the sewers tributary to Outfall 007 were designed and constructed to be CSO's. Tr. at 10.

Additionally, based on the hearing testimony set forth above, the Board also finds that the Agency's argument that grant money would be impacted by the requested reclassification is groundless. Rock Island's proof is uncontradicted, and the Agency has presented no evidence that the designation of Outfall 007 as a sanitary sewer is somehow necessary to accomplish the purposes of the Act and Board regulations.

Finally, the parties agree that when the ongoing improvements to the sewers tributary to Outfall 007 are completed, there will be no overflows from that Outfall. Pet. Reply Br. at 6; Ag. Br. at 5; Tr. at 19. The Board finds, therefore, that reclassification of Outfall 007 as a CSO would not cause a violation of the Act or Board regulations. Accordingly, the Board finds that this condition must be remanded to the Agency for revision consistent with this opinion and order.

Condition Three: Chlorine Residual Limitations

Rock Island's NPDES Permit (No. IL0030783) included a condition that limits the chlorine residual limitations from outfalls 011 and 012 at 0.75 mg/L. Rock Island had requested that the chlorine residual limitation be set at 1.0 mg/L. Rock Island requested the higher limit due to difficulties in meeting the fecal coliform limitation and, at the same time, maintaining chlorine limits at or below 0.75 mg/L. Finally, Rock Island argues that the 1.0 mg/L chlorine residual limitation is consistent with other similar types of permits.

At hearing, the parties stipulated that they had reached an agreement whereby the Agency agreed to include a chlorine residual limitation of 1.0 mg/L subject to its ability to later reduce the number if it is determined that Rock Island can meet the fecal coliform limitation and still maintain a lower chlorine residual amount. The language of the stipulation is as follows:

> MR. HARSCH: The second stipulation has to do with the appropriate chlorine residual limitation for basin discharges O11 and O12. I believe our agreement is that we would ask the board to remand that issue back to the agency for the agency to include a chlorine residual limitation of 1.0 milligrams per liter of chlorine subject to the agency's ability to lower that number if it's determined with use that Rock Island can meet the fecal chloroform limitation and still maintain a lower chlorine residual.
>
> * * *
>
> HEARING OFFICER KNITTLE: Back on the record. The second stipulation will be accepted as well. Tr. at 8.

In accordance with this stipulation, the parties requested that the Board remand this issue back to the Agency for a revision of the NPDES permit consistent with the stipulation described above.

However, because the Agency may lack the authority to reconsider its own permitting decision, the Board is reluctant to merely remand this issue to the Agency as requested. In Reichhold Chemicals, Inc. v. PCB, 204 Ill. App. 3d 674, 561 N.E.2d 1343 (3rd Dist. 1990), the appellate court held that, "[i]n view of the case law denying administrative agencies the authority to change or modify decisions . . . we conclude that the Agency here had no authority to reconsider or modify . . . [its] decision." Reichhold Chemicals, 204 Ill. App. 3d at 678, 561 N.E.2d at 1345. Accordingly, we will consider whether this third challenged condition is necessary to accomplish the purposes of the Act and Board regulations. See Browning-Ferris, Inc. v. PCB, 179 Ill. App. 3d 598, 534 N.E.2d 616 (2nd Dist. 1989).

With regard to residual chlorine, there is no specific regulation that prescribes acceptable levels. However, the Agency typically imposes a residual chlorine limitation to ensure that the waters of the State meet the requirements of the Clean Water Act. The federal regulations at 40 CFR 123.5 authorize the State to establish permit conditions that may not be specifically set forth in the regulations.

The Act specifies fecal coliform limits under the general use water quality standard 35 Ill. Adm. Code 302.209, but the Act does not specify a specific chlorine residual to accomplish this standard. Specification of the chlorine residual is typically left to the Agency's discretion based on the quality of effluent and characteristics of the receiving stream. Otherwise, the only limitation for chlorine is found in the Numeric Standards for Chemical Constituents in 35 Ill. Adm. Code 302.208(g); that limit is 500 mg/L for total chloride.

Chlorine helps to ensure adequate disinfection at the treatment plant as well as through the distribution system to the outfall. Along with the fecal coliform counts, the chlorine residual is a parameter the Agency uses to evaluate effectiveness of disinfection. Maintaining the proper balance between disinfection and chlorine residual is important since generally accepted water quality principles indicate that too much chlorine can be harmful. Without a federal or State standard, the precise limit for chlorine residual is determined on a site-specific basis considering the receiving water quality characteristics and State policy. The final determining factor for effective disinfection, however, is the fecal coliform count, not the chlorine residual. The Board has established fecal coliform standards at 35 Ill. Adm. Code 302.209 that apply to the receiving stream. The effluent discharge from Rock Island's treatment plant must comply with the fecal coliform water quality standard. In this regard, Rock Island asserts that the residual chlorine level of 0.75 mg/L may not be appropriate for its discharge since it may hinder its ability to meet the State and federal water quality standards for fecal coliform.

Other than stating that it experienced difficulties in meeting the fecal coliform limitation and maintaining chlorine limits to below 0.75 mg/L, Rock Island provided the Board with no supporting history or data to show such difficulties. However, it appears that the Agency agreed with Rock Island that the residual chlorine level of 0.75 mg/L may not be appropriate to ensure compliance with the fecal coliform standard. In light of this, the Board finds that the residual chlorine level of 0.75 mg/L is not

necessary to accomplish the purposes of the Act or Board regulations. Accordingly, the Board directs the Agency to revise the residual chlorine level to 1.0 mg/L. The Agency may revise the residual chlorine limit during the next permit renewal if monitoring information collected during the term of the current permit warrants such a revision.
The challenged condition is hereby remanded to the Agency for revision consistent with this opinion and order.

CONCLUSION

The Board finds that Rock Island has demonstrated that the three conditions, as imposed by the Agency, are not necessary to accomplish the purposes of the Act and of Board regulations. First, the Board finds that requiring Rock Island to treat the "16 MGD" rather than "maximum practical flow" prior to utilizing the CSO is not a necessary condition of the permit. Furthermore, this condition, as applied to Rock Island, is arbitrary.

Second, the Board finds that Outfall 007 should be reclassified as a combined sewer overflow because the historic and current use of the sewers tributary to the outfall is inconsistent with the definition of a sanitary sewer. It is undisputed that when ongoing improvements are completed, there will be no overflow from this outfall; therefore, its classification as a sanitary sewer outfall, with its restrictions on discharge, is not necessary to accomplish to the purposes of the Act and Board regulations.

Finally, the Board finds that the permit condition imposing a chlorine residual limitation of .75 mg/L is not necessary to accomplish the purposes of the Act. The Board bases this decision on Rock Island's assertion that the .75 mg/L limit may cause it to violate the terms of both its NPDES permit and Board regulations regarding fecal coliform limits. Additionally, the Board notes that while there is a regulatory standard for fecal coliform, there is no standard for chlorine residual amounts. Accordingly, the Board will remand the issue of the chlorine residual limitations to the Agency for further action consistent with this opinion and order.

This opinion constitutes the Board's findings of fact and conclusions of law in this matter.

ORDER

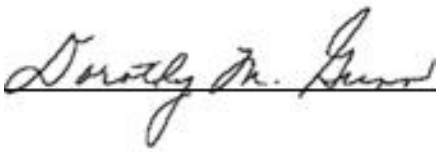
The City of Rock Island's appeal of its NPDES permit is granted and the permit is remanded to the Illinois Environmental Protection Agency for reissuance consistent with the terms of this opinion and order. This docket is closed.

IT IS SO ORDERED.

Chairman C.A. Manning abstained.

Section 41 of the Environmental Protection Act, (415 ILCS 5/41 (1998)), provides for the appeal of final Board orders to the Illinois Appellate Court within 35 days of the date of service of this order. Illinois Supreme Court Rule 35 establishes such filing requirements. See 172 Ill. 2d R 335; see also 35 Ill. Adm. Code 101.246, Motions for Reconsideration.

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, do hereby certify that the above opinion and order was adopted on the 13th day of July 2000 by a vote of 6-0.



Dorothy M. Gunn, Clerk
Illinois Pollution Control Board