

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CITY OF CHICAGO,)	
)	
)	
Petitioner,)	
)	
v.)	PCB No. 2016-14
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on July 26, 2018, the City of Chicago electronically filed with the Office of the Clerk of the Illinois Pollution Control Board two **Individual Submittals in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Water System / Des Plaines River Watershed**, copies of which are hereby served upon you.

Dated: July 26, 2018

CITY OF CHICAGO

By: /s/ Jared Policicchio
One of Its Attorneys

Jared Policicchio, Supervising Assistant Corporation Counsel
CITY OF CHICAGO
DEPARTMENT OF LAW
30 North LaSalle Street
Suite 1400
Chicago, IL 60602
(312) 744-1438
jared.policicchio@cityofchicago.org

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CITY OF CHICAGO,)	
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Petitioner,)	
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v.)	PCB No. 2016-14
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

APPEARANCE

The undersigned, as one of its attorneys, hereby enters his appearance on behalf of the **City of Chicago**.

Dated: July 26, 2018

CITY OF CHICAGO

By: /s/ Jared Policicchio
One of Its Attorneys

Jared Policicchio, Supervising Assistant Corporation Counsel
CITY OF CHICAGO
DEPARTMENT OF LAW
30 North LaSalle Street
Suite 1400
Chicago, IL 60602
(312) 744-1438
jared.policicchio@cityofchicago.org

PROOF OF SERVICE

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **Individual Submittals in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Water System / Des Plaines River Watershed**,, to be served via First Class Mail, postage paid, from 30 North LaSalle Street, Chicago, Illinois, 60602 on the 26th day of July, 2018 to:

See Attached Service List

/s/ Jared Policicchio _____

One of Its Attorneys

SERVICE LIST

Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center, Suite 11-500
100 W. Randolph Street
Chicago, IL 60601

PCB 2016-014@
Sara Terranova
IEPA
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PCB 2016-014@
Stefanie N. Diers
IEPA
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PCB 2016-015@
Dennis Walsh
Klein, Thorpe & Jenkins
15010 S. Ravinia Avenue
Suite 17
Orland Park, IL 60477

PCB 2016-029@
Paul Drucker
Barnes & Thornburg
1 N. Wacker Drive
Suite 4400
Chicago, IL 60606

PCB 2016-017@
Dennis Walsh
Klein, Thorpe & Jenkins
15010 S. Ravinia Avenue
Suite 17
Orland Park, IL 60477

PCB 2016-020@
Dennis Walsh
Tressler, LLP
233 S. Wacker Drive
22nd Floor
Chicago, IL 60606

PCB 2016-014@
Christopher J. Cummings
Christopher J. Cummings, P.C.
2014 Hickory Road
Suite 205
Homewood, IL 60430

PCB 2016-014@
Albert Ettinger
Law Firm of Albert Ettinger
53 W. Jackson
Suite 1664
Chicago, IL 60604

PCB 2016-015@
E. Kenneth Friker
Klein, Thorpe & Jenkins
15010 S. Ravinia Avenue
Suite 17
Orland Park, IL 60477

PCB 2016-016@
Peter Murphy
11800 S. 75th Avenue
Suite 101
Palos Heights, IL 60463

PCB 2016-018@
Katherine D. Hodge
Heplerbroom, LLC
4340 Acer Grove Drive
Springfield, IL 62711

PCB 2016-021@
Amber M. Samuelson
Rosenthal, Murphey, Coblentz
& Donahue
30 N. LaSalle Street, Suite 1624
Chicago, IL 60602

PCB 2016-021 @
Peter D. Coblentz
Rosenthal, Murphey, Coblentz
& Donahue
30 N. LaSalle Street, Suite 1624
Chicago, IL 60602

PCB 2016-023 @
Katherine D. Hodge
Heplerbroom, LLC
4340 Acer Grove Drive
Springfield, IL 62711

PCB 2016-025 @
David Stoneback, Director
City of Evanston
555 Lincoln St.
Evanston, IL 60201

PCB 2016-025 @
Lindsey Ott
City of Evanston
555 Lincoln St.
Evanston, IL 60201

PCB 2016-026 @
Melanie Pettway
Village of Skokie
5127 Oakton Street
Skokie, IL 60077

PCB 2016-027 @
Matthew D. Dougherty
Special Assistant Attorney General
Illinois Dept. of Transportation
2300 S. Dirksen Parkway
Springfield, IL 62764

PCB 2016-029 @
Fredric P. Andes
Barnes & Thornburg
1 N. Wacker Drive
Suite 4400
Chicago, IL 60606

PCB 2016-022 @
John P. Antonopoulos
Antonopoulos & Virtel, PC
15419 127th Street
Suite 100
Lemont, IL 60439

PCB 2016-023 @
Joshua Houser
Heplerbroom, LLC
4340 Acer Grove Drive
Springfield, IL 62711

PCB 2016-025 @
Mario Treto
Corporation Counsel
City of Evanston Law Department
2100 Ridge Road
Evanston, IL 60201

PCB 2016-026 @
James G. McCarthy
Village of Skokie
5127 Oakton Street
Skokie, IL 60077

PCB 2016-026 @
Michael M. Lorge
Village of Skokie
5127 Oakton Street
Skokie, IL 60077

PCB 2016-029 @
Margaret T. Conway
Metropolitan Water Reclamation
District
100 E. Erie Street
Chicago, IL 60611

PCB 2016-030 @
Amber M. Samuelson
Rosenthal, Murphey, Coblentz
& Donahue
30 N. LaSalle Street, Suite 1624
Chicago, IL 60602

PCB 2016-030@
Peter D. Coblentz
Rosenthal, Murphey Coblentz
& Donahue
30 N. LaSalle Street, Suite 1624
Chicago, IL 60602

PCB 2016-031@
Hart M. Passman
Holland & Knight LLC
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

PCB 2016-033@
Richard Rinchich
Director of Public Works
City of Oak Forest
15440 S. Central Avenue
Oak Forest, IL 60452

PCB 2016-033@
Erin K. Lavery
Klein, Thorpe & Jenkins, Ltd.
20 N. Wacker Drive
Suite 1660
Chicago, IL 60606

PCB 2016-031@
Andrew N. Fiske
Holland & Knight LLC
131 S. Dearborn Street
30th floor
Chicago, IL 60603

PCB 2016-031@
Steven M. Elrod
Holland & Knight LLC
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

PCB 2016-033@
Dennis G. Walsh
Klein, Thorpe & Jenkins, Ltd.
20 N. Wacker Drive
Suite 1660
Chicago, IL 60606

PCB 2016-033@
Scott F. Uhler
Klein, Thorpe & Jenkins, Ltd.
20 N. Wacker Drive
Suite 1660
Chicago, IL 60606

ILLINOIS POLLUTION CONTROL BOARD

Docket Numbers: PCB 2016-14, PCB 2016-15, PCB 2016-16, PCB 2016-17, PCB 2016-18,
PCB 2016-20, PCB 2016-21, PCB 2016-22, PCB 2016-23, PCB 2016-25, PCB 2016-26,
PCB 2016-27, PCB 2016-29, PCB 2016-30, PCB 2016-31, PCB 2016-33
Time-Limited Water Quality Standard) (Consolidated)

*Individual Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard
("TLWQS") for the Defined Chicago Area Water System/Des Plaines River Watershed*

This Individual Submittal supplements the Joint Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Waterway System/Des Plaines River Watershed ("Joint Submittal"), submitted in the above-referenced docket numbers. The Joint Submittal incorporated by reference, together with this Individual Submittal, satisfies the requirements of 35 IAC Part 104, Subpart E for each Facility.

An Individual Submittal must be made for each permitted Facility discharging to a reach in the Watershed defined by the Joint Submittal that seeks to be covered by the TLWQS in this Docket.

This Individual Submittal must be made no later than July 26, 2018 for continued coverage (or initial coverage for new petitioners) under the current stay of effectiveness of the chlorides standards, found in 35 IAC 302.407(g)(2) and (g)(3).

Note: Discharges to General Use waters in the Watershed, which are subject to the chlorides standards in 35 IAC 302.208(g), can participate in the TLWQS, but the stay does not apply to those discharges.

Individual Discharger Information

1. Facility Name of Individual Discharger: City of Chicago
2. Owner/Operator of Facility: Department of Water Management
3. Address of Facility: 1000 East Ohio Street, Chicago, Illinois 60611
4. Contact Information for Facility's Responsible Official:
Name: William Cheaks Title: Managing Deputy Commissioner
Mailing Address: 1000 East Ohio Street, Chicago, Illinois 60611
Phone Number: 312-744-7010 Email: william.cheaks@cityofchicago.org
5. Permit Number of Facility (include both National Pollutant Discharge Elimination System ("NPDES") Permits and Municipal Separate Storm Sewer System ("MS4") Permits that may be affected by the TLWQS): ILR400173

6. Are there any pending permit applications filed with Illinois Environmental Protection Agency that do not appear as part of the Joint Submittal's Appendices 5 and 6?

Yes No

If Yes, provide the application number for the pending permit(s): _____

7. Select Category of Facility:

Publicly Owned Treatment Works ("POTW") Industrial Source

Illinois Department of Transportation/Illinois Tollway Salt Storage Facility

Community with Combined Sewer Overflow ("CSO") Outfalls MS4

Location of Individual Discharger

8. Each Individual Submittal must provide the specific location information in the Watershed for the Facility seeking coverage under the TLWQS. Select the location of the discharge from the Facility from the list below:

The Chicago Area Waterway System ("CAWS") includes the following reaches:

Chicago River, North Branch of the Chicago River,

South Branch of the Chicago River, Chicago Sanitary and Ship Canal,

Cal-Sag Channel, Grand Calumet River, Lake Calumet,

Lake Calumet Connecting Channel, Calumet and Little Calumet Rivers, and

North Shore Channel

The Lower Des Plaines River ("LDPR") includes the following areas:

Des Plaines River from the Kankakee River to the Will County Line,

Hickory Creek, Union Ditch, Spring Creek, Marley Creek, and

East Branch of Marley Creek

9. The specific discharge locations for the Facility are:

a. Outfall number(s): Various

b. General description of outfall location:

See attached maps

c. Outfall(s) appears on CAWS or LDPR list of Discharge Points (Joint Submittal Appendices 5 and 6): Yes No

TLWQS Requirements

10. Has any prior variance applied to the discharge from this Facility? Yes No

If yes, please identify the variance providing similar relief, including any Illinois Pollution Control Board docket number issued to the Individual Discharger, watershed, water body, waterbody segment, and if known, the Individual Discharger's predecessors.

Facility-Specific TLWQS Requirements

11. The Facility agrees to implement all of the Best Management Practices ("BMPs") included for the MS4 Category (from #8, above) for the Facility that are specified for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal.

12. Identify any past or currently in-use BMPs at the Facility for minimizing the discharge of chlorides.

See attached "De-icing and Snow Removal Best Management Practices"

13. Will any additional BMPs, beyond those included for the Category of the Facility for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal, be implemented?
 Yes No

If Yes, describe any additional BMPs:

14. By six (6) months after the effective date of the TLWQS, each Facility covered by the TLWQS must have a Pollutant Minimization Plan (PMP) that contains specific details as to how the BMPs will be implemented and includes appropriate elements from the documentation procedures identified in Appendix 54 of the Joint Submittal. Chapter 9 of the Joint Submittal describes these requirements in more detail.

Has the Facility already developed a PMP to address its discharge of chlorides?

Yes No

If Yes, what is the date of the PMP? _____

If the Facility has not already developed the described PMP, does the Facility agree to develop the described PMP no later than six (6) months after the effective date of the TLWQS?

Yes No

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name & Official Title (Type or Print)

William Cheeks, Jr. MGNJ Deputy Clerk

Signature



Date Signed

7-25-18

**Attachment in Response to Question 9: Map of Outfall Numbers and Locations
That Discharge Into a Reach in the Watershed Defined by the Joint Submittal**

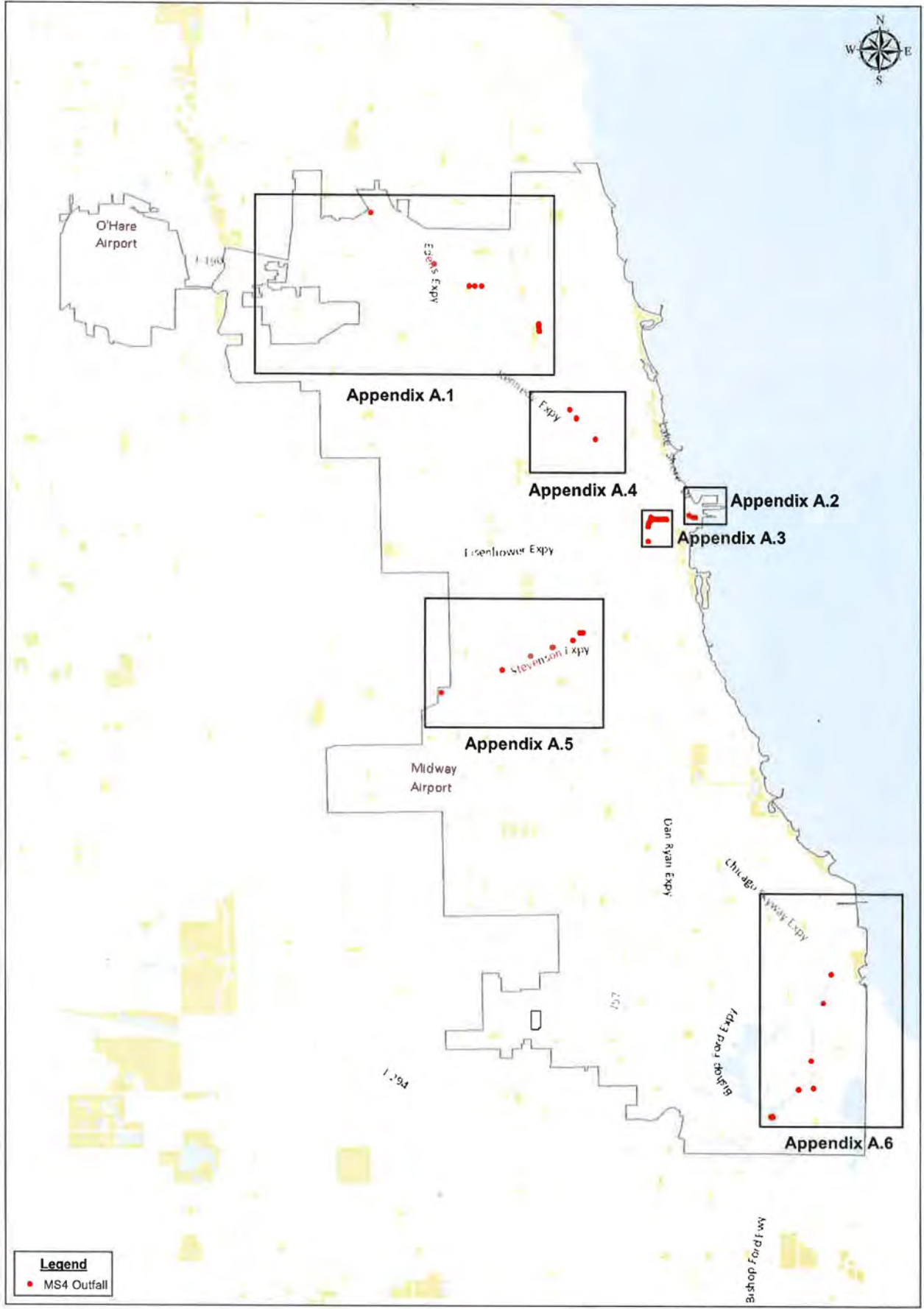


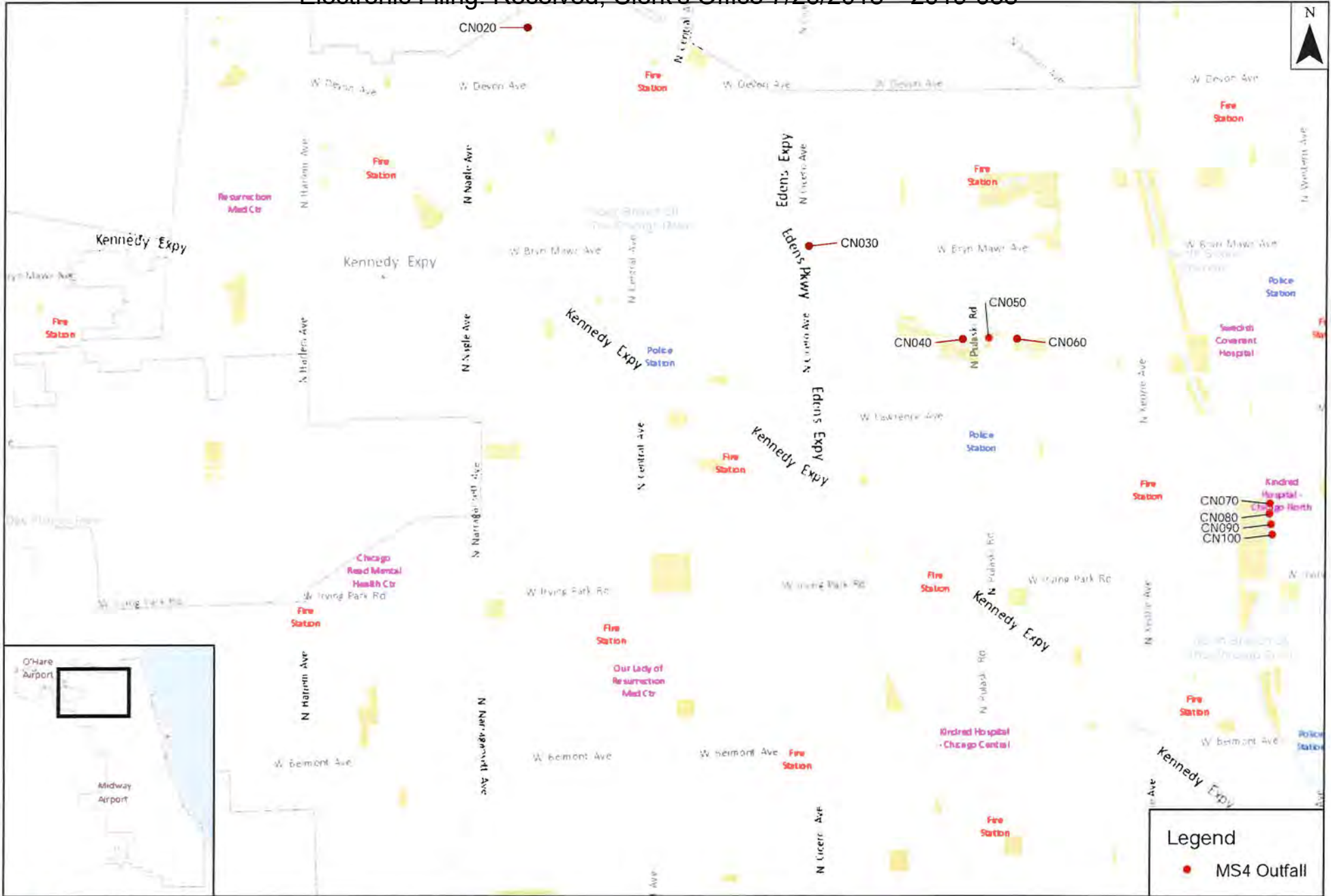
Department of Water Management
Randy Conner, Commissioner

MS4 Outfalls Discharging to Applicable Waterways

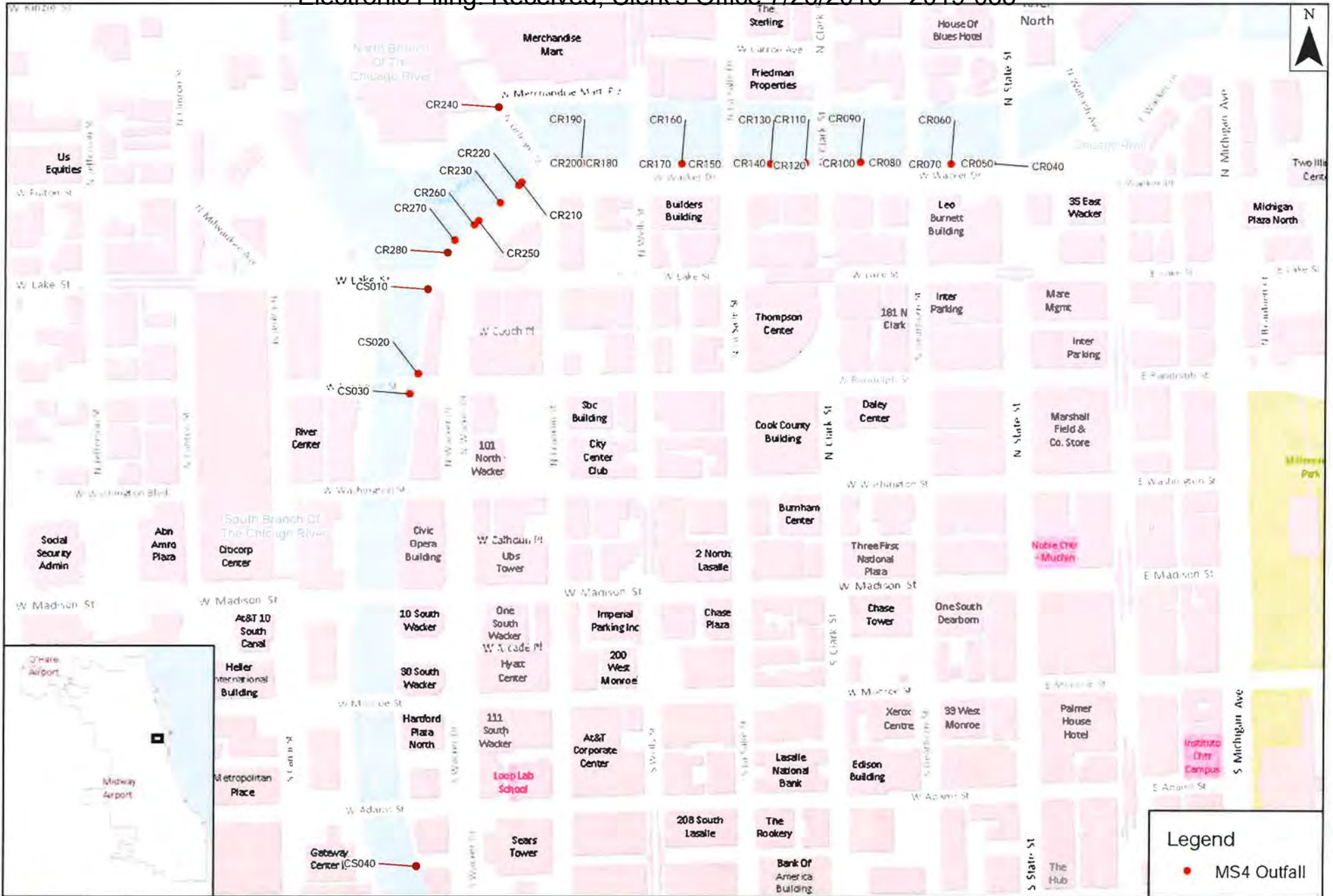


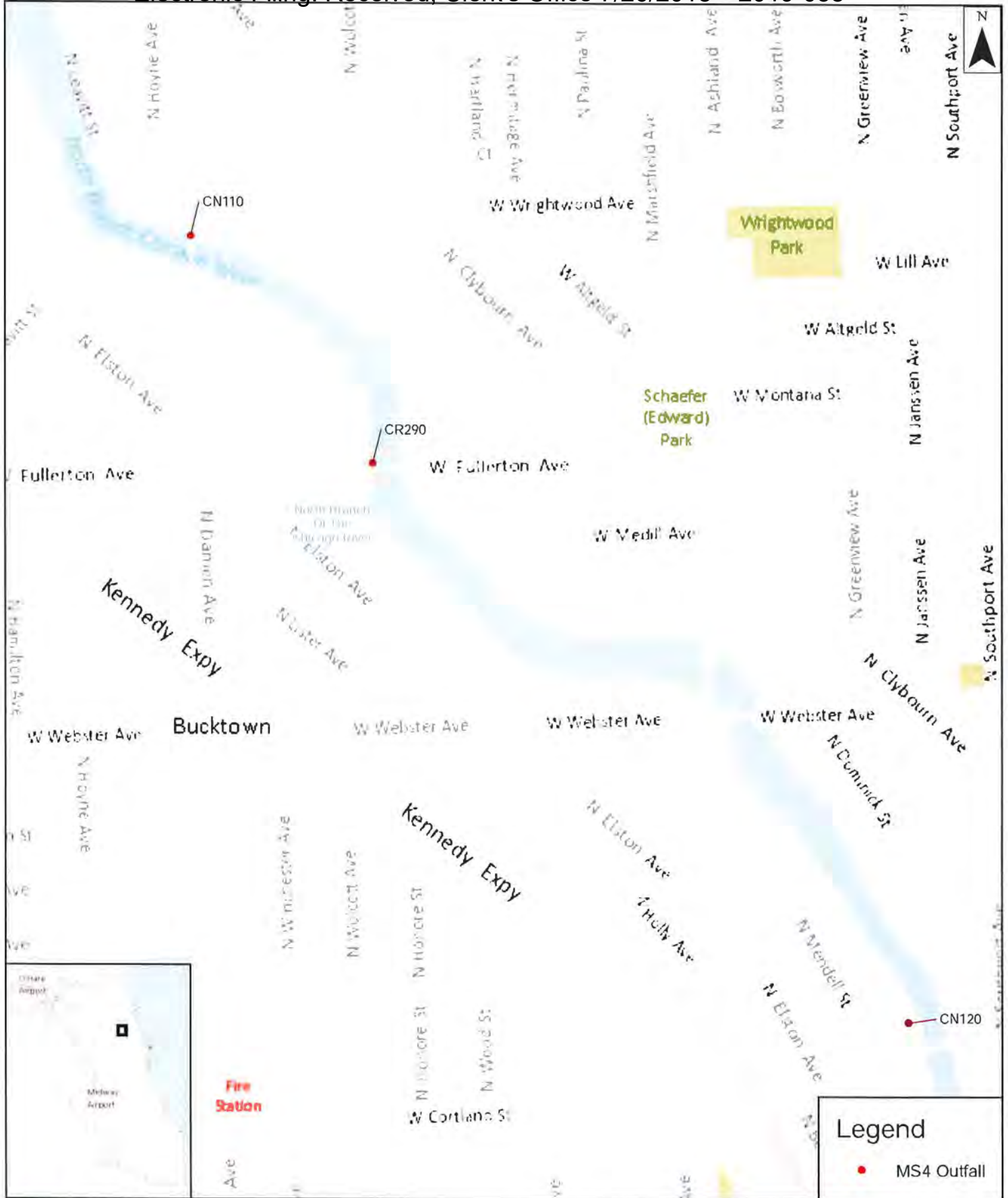
City of Chicago
Rahm Emanuel, Mayor







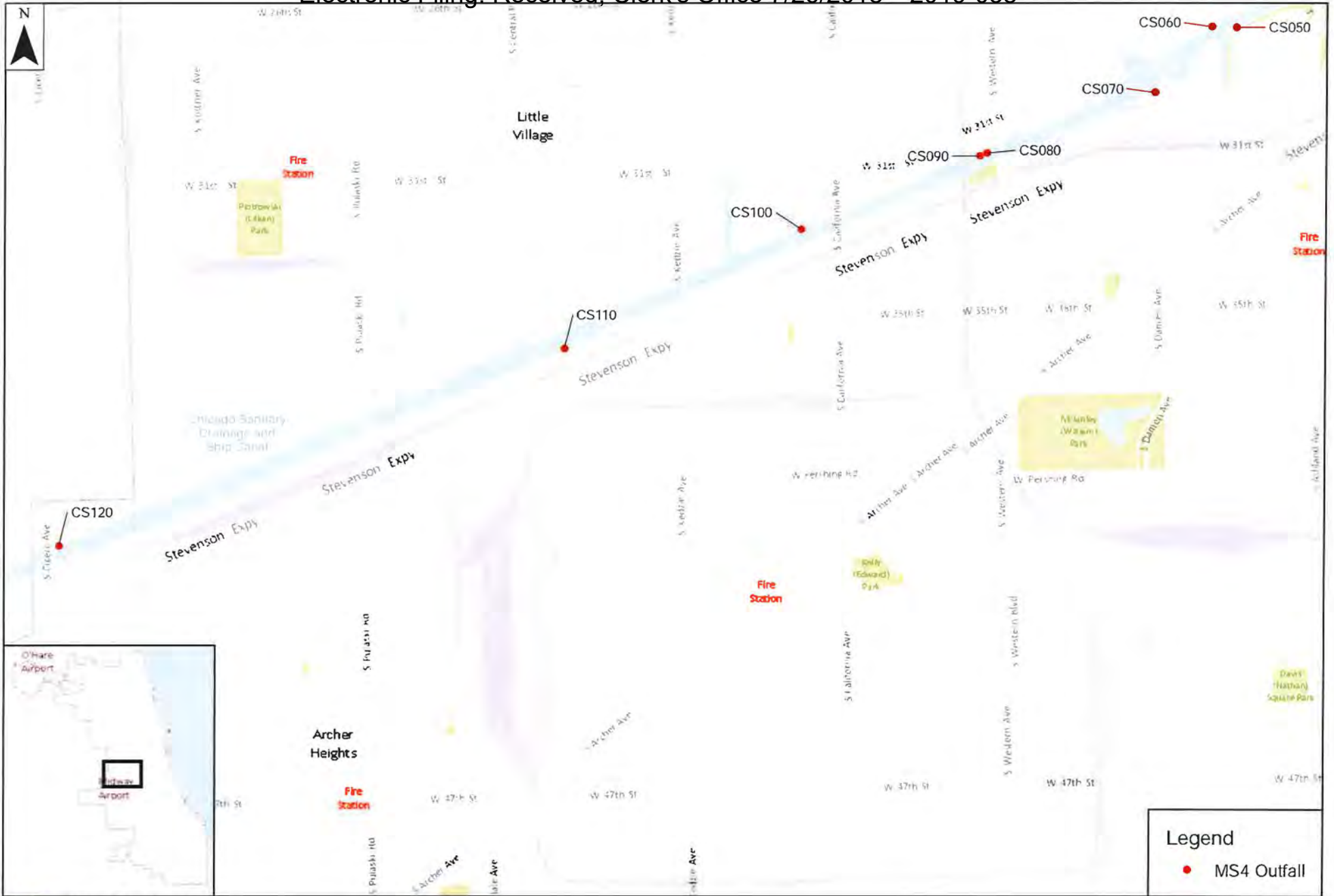




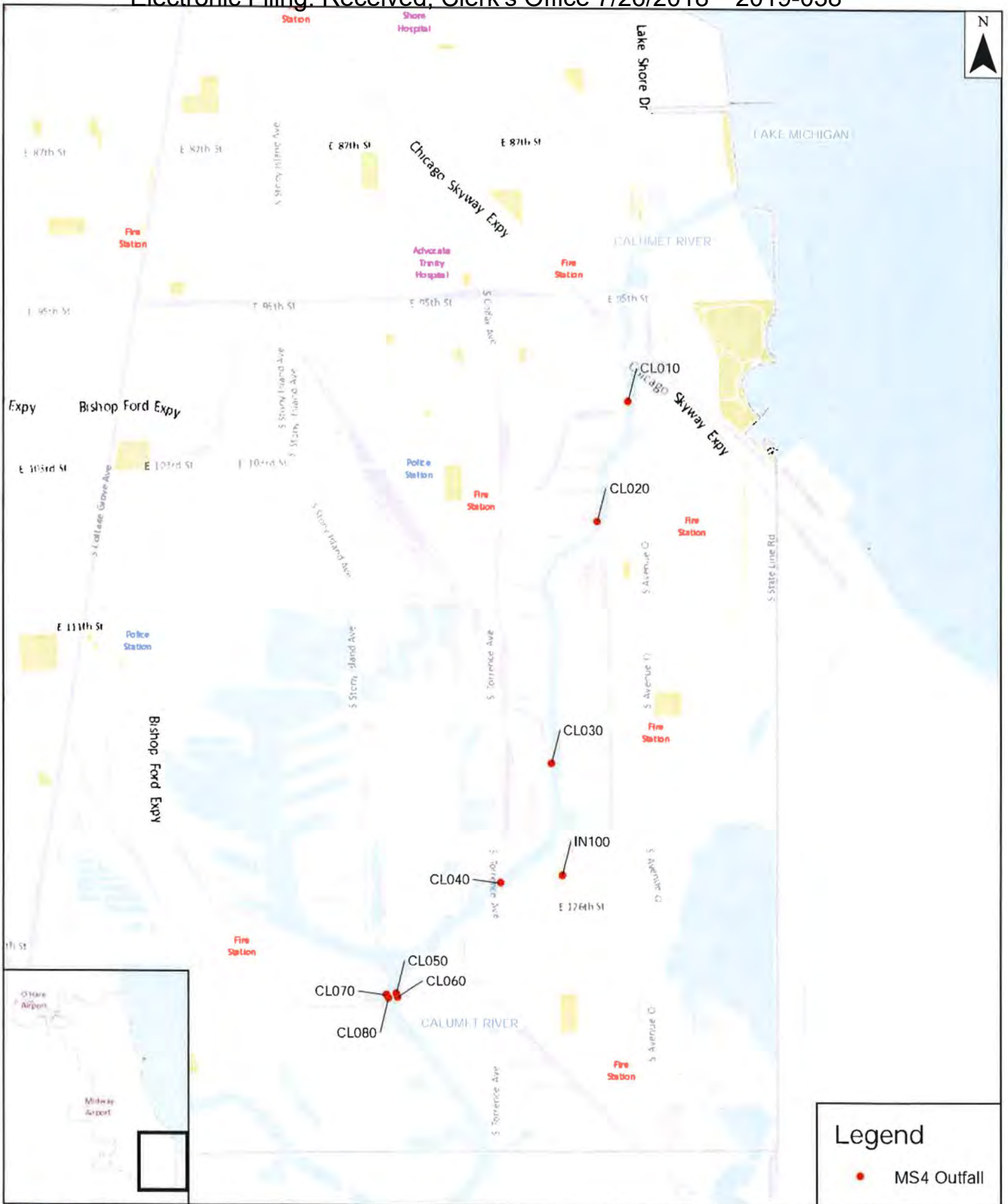
City of Chicago
Department of Water Management



MS4 Outfalls Discharging to Applicable Waterways
Appendix A.4



Legend
● MS4 Outfall



City of Chicago
Department of Water Management



MS4 Outfalls Discharging to Applicable Waterways
Appendix A.6

Attachment in Response to Question 12: Past or Currently In-Use BMPs at the Facility for Minimizing the Discharge of Chlorides

DEICING AND SNOW REMOVAL BEST MANAGEMENT PRACTICES

The Chicago Area Waterways (CAWS) Chloride Reduction Initiative Workgroup is seeking information on Best Management Practices (BMPs) for Snow and Ice Removal. The goal of this brief survey is to determine 1) what BMPs are currently performed on a routine basis by various entities within the watershed; and 2) what BMPs that an entity is willing to perform in addition to those BMPs currently practiced. This information will help to develop the variance petition currently being drafted for submittal to the Illinois Pollution Control Board (IPCB).

Please take a few moments to complete this survey. The variance petition will be drafted based on the responses received from this document. **This is your opportunity to have a voice in any regulatory requirements that result from the petition and subsequent decisions by the IPCB.**

Please return the completed survey to Kristie Rodocker by January 27, 2017, via mail, e-mail or fax:

MWRDGC
100 East Erie Street
Chicago, IL 60611

Fax: (312) 751-5145
kristie.rodocker@mwrdd.org

Municipality: City of Chicago _____

Agency: Chicago Department of Streets & Sanitation _____

Industry: _____

Receiving Stream: _____

Contact Name: Cole Stallard Contact #: 312-744-5911 _____

Contact Email: cole.stallard@cityofchicago.org

Listed below are several categories of BMPs for Snow and Ice Removal. Please review each one and check off those BMPs that your organization currently performs on a regular basis. In addition, please check whether your organization would be willing to perform these BMPs on a regular basis if you are not already doing so.

	<u>Currently Implement</u>			<u>Will Implement</u>	
	<u>Yes</u>	<u>No</u>		<u>Yes</u>	<u>No</u>
Salt Storage					
1. Impervious Pad ¹	_X_	___	(in process)	_X_	___
2. Pile Completely Covered ²	_X_	___		___	___
3. Runoff Containment ³	_X_	___		___	___
4. Indoor Storage ⁴	_X_	___	(some sites)	___	___
5. Good housekeeping	_X_	___		___	___
6. Level loading Areas	_X_	___		___	___

¹ Currently, approximately 40% of the 19 salt pads used by the Chicago Department of Streets & Sanitation (DSS) have impervious pads.

² Currently, 7 of 19 DSS salt pads contained in a salt dome, the remainder tarped.

³ Runoff containment provided by domes, for salt in salt domes; for non-domed pads, Jersey blocks around piles provide control runoff.

⁴ Currently, 7 salt pads are contained in salt domes, out of total of 19 salt pads.

Pre-Wetting⁵ X

Anti-icing⁶ X

Variable Application Rates accounting for:

1) Pavement temperature X

2) Precipitation rate/type X

3) Level of Service X

4) Cycle Time X

5) Use Ground Speed
 Controllers X

Calibration

1. Before Winter Season X

2. Regular schedule⁷ X

3. Upon change in material⁸ X

Measurement

1) Condition of Road vs.
 Severity of Storm X

2) Track salt usage per event
 for each operator X

3) Salt usage overall X

4) Snowfall per event X

5) Total seasonal snowfall X

6) Average salt use per lane-mile⁹ X

7) Instrumentation to determine
 grip of road¹⁰ X

8) Determine accuracy of forecasts X

9) Document if level of service(s)
 were achieved¹¹ X

Accountability

⁵ In very cold temperatures, DSS will pre-wet salt before application, depending on temperature, to reduce bounce and scatter and to activate salt (to prevent snow and ice bonding).

⁶ DSS pre-wets bridges, overpasses, Lakeshore Drive and Stony Island. 20,000 Gallons of beet juice normally employed per event.

⁷ Calibration before de-icing season, and whenever trucks go in for service.

⁸ Calibration when changing between beet juice, salt, or combination of both.

⁹ The City has developed the capacity to track per-mile salt use, but currently has not activated.

¹⁰ Lasers installed on bridges, overpasses and Lakeshore Drive at 12 locations to determine dew point, grip level, ground temperature, air temperature and status of bridges at the time (wet, moist, icy, dry).

¹¹ Track complaints (Customer Service Requests), develop heat maps based on CSR data to determine where issues are.

1) Plan developed and guidelines followed ¹²	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Plan and guidelines distributed to all crew and staff ¹³	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Liquid Usage¹⁴	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Salt Usage unless treated at temps below 15 degrees F and greater than 0 degrees F¹⁵	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of materials that promote traction at temps below 0 degrees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of Forecasting Services¹⁶	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training for all appropriate staff¹⁷	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Outreach (if municipality)				
1) Offer classes for citizens/private applicators	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Promotes clear message ¹⁸	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Application				
1) Use mechanical removal asap and throughout storm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Use of methods to reduce bounce and scatter:				
a. Reduce speed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Higher liquid to granular ratio	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Lower spinner elevation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Chutes or skirts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Reduced spinner speed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Target center of road	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹² Train staff and advise via radio during events, and have follow-up observations by supervisors to assess application.

¹³ Plans and guidelines distributed through DSS training program and radio.

¹⁴ Use beet juice.

¹⁵ Will treat where needed, to prevent bounce and scatter.

¹⁶ Use AccuWeather service.

¹⁷ Starting in May of each year, DSS distributes information on snow and de-icing, with meetings of various sizes with operators, and distributes information via printed handouts.

¹⁸ Public outreach primarily conducted through news media.

What makes your chosen options attractive? DSS makes an effort to implement strategies that promote the safe and efficient use of salt. DSS favors strategies that protect the environment, and are both cost-effective and operationally effective.

What prevents you from implementing other options? DSS is unable to consider options that are cost prohibitive.

Other Comments:

Other BMPs not included on the form which DSS is implementing or could consider for implementation in the future include:

1. Moving salt piles further away from waterways.
2. Increased frequency of calibration of road salt application equipment.
3. Increased training regarding road salt use.
4. Increased use of beet juice.
5. Use of lasers installed on roadways to provide real-time information regarding dew point, grip level, ground temperature, air temperature and status of roadway.
6. Review and update O&M guidelines relating to road salt use.
7. Increased efforts to measure and track implementation of BMPs and assess their impacts.
8. Increased efforts to check and clean equipment before/after use to identify any leaks, remove excess salt, etc.

Thank you for your feedback!

ILLINOIS POLLUTION CONTROL BOARD

Docket Numbers: PCB 2016-14, PCB 2016-15, PCB 2016-16, PCB 2016-17, PCB 2016-18,
PCB 2016-20, PCB 2016-21, PCB 2016-22, PCB 2016-23, PCB 2016-25, PCB 2016-26,
PCB 2016-27, PCB 2016-29, PCB 2016-30, PCB 2016-31, PCB 2016-33
Time-Limited Water Quality Standard) (Consolidated)

*Individual Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard
("TLWQS") for the Defined Chicago Area Water System/Des Plaines River Watershed*

This Individual Submittal supplements the Joint Submittal in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Waterway System/Des Plaines River Watershed ("Joint Submittal"), submitted in the above-referenced docket numbers. The Joint Submittal incorporated by reference, together with this Individual Submittal, satisfies the requirements of 35 IAC Part 104, Subpart E for each Facility.

An Individual Submittal must be made for each permitted Facility discharging to a reach in the Watershed defined by the Joint Submittal that seeks to be covered by the TLWQS in this Docket.

This Individual Submittal must be made no later than July 26, 2018 for continued coverage (or initial coverage for new petitioners) under the current stay of effectiveness of the chlorides standards, found in 35 IAC 302.407(g)(2) and (g)(3).

Note: Discharges to General Use waters in the Watershed, which are subject to the chlorides standards in 35 IAC 302.208(g), can participate in the TLWQS, but the stay does not apply to those discharges.

Individual Discharger Information

1. Facility Name of Individual Discharger: City of Chicago
2. Owner/Operator of Facility: Department of Water Management
3. Address of Facility: 1000 East Ohio Street, Chicago, Illinois 60611
4. Contact Information for Facility's Responsible Official:
Name: William Cheaks Title: Managing Deputy Commissioner
Mailing Address: 1000 East Ohio Street, Chicago, Illinois 60611
Phone Number: 312-744-7010 Email: william.cheaks@cityofchicago.org
5. Permit Number of Facility (include both National Pollutant Discharge Elimination System ("NPDES") Permits and Municipal Separate Storm Sewer System ("MS4") Permits that may be affected by the TLWQS): IL0045012

6. Are there any pending permit applications filed with Illinois Environmental Protection Agency that do not appear as part of the Joint Submittal's Appendices 5 and 6?

Yes No

If Yes, provide the application number for the pending permit(s): _____

7. Select Category of Facility:

Publicly Owned Treatment Works ("POTW") Industrial Source

Illinois Department of Transportation/Illinois Tollway Salt Storage Facility

Community with Combined Sewer Overflow ("CSO") Outfalls MS4

Location of Individual Discharger

8. Each Individual Submittal must provide the specific location information in the Watershed for the Facility seeking coverage under the TLWQS. Select the location of the discharge from the Facility from the list below:

The Chicago Area Waterway System ("CAWS") includes the following reaches:

Chicago River, North Branch of the Chicago River,

South Branch of the Chicago River, Chicago Sanitary and Ship Canal,

Cal-Sag Channel, Grand Calumet River, Lake Calumet,

Lake Calumet Connecting Channel, Calumet and Little Calumet Rivers, and

North Shore Channel

The Lower Des Plaines River ("LDPR") includes the following areas:

Des Plaines River from the Kankakee River to the Will County Line,

Hickory Creek, Union Ditch, Spring Creek, Marley Creek, and

East Branch of Marley Creek

9. The specific discharge locations for the Facility are:

a. Outfall number(s): Various

b. General description of outfall location:

See attached maps

c. Outfall(s) appears on CAWS or LDPR list of Discharge Points (Joint Submittal Appendices 5 and 6): Yes No

TLWQS Requirements

10. Has any prior variance applied to the discharge from this Facility? Yes No

If yes, please identify the variance providing similar relief, including any Illinois Pollution Control Board docket number issued to the Individual Discharger, watershed, water body, waterbody segment, and if known, the Individual Discharger's predecessors.

Facility-Specific TLWQS Requirements

11. The Facility agrees to implement all of the Best Management Practices ("BMPs") included for the Community w/ CSO Category (from #8, above) for the Facility that are specified for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal.

12. Identify any past or currently in-use BMPs at the Facility for minimizing the discharge of chlorides.

See attached "De-icing and Snow Removal Best Management Practices"

13. Will any additional BMPs, beyond those included for the Category of the Facility for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal, be implemented?
 Yes No

If Yes, describe any additional BMPs:

14. By six (6) months after the effective date of the TLWQS, each Facility covered by the TLWQS must have a Pollutant Minimization Plan (PMP) that contains specific details as to how the BMPs will be implemented and includes appropriate elements from the documentation procedures identified in Appendix 54 of the Joint Submittal. Chapter 9 of the Joint Submittal describes these requirements in more detail.

Has the Facility already developed a PMP to address its discharge of chlorides?

Yes No

If Yes, what is the date of the PMP? _____

If the Facility has not already developed the described PMP, does the Facility agree to develop the described PMP no later than six (6) months after the effective date of the TLWQS?

Yes No

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name & Official Title (Type or Print)

Wm A. CHEAKS, JR. MGNB DEPUTY CLERK

Signature



Date Signed

7-25-18

**Attachment in Response to Question 9: Map of Outfall Numbers and Locations
That Discharge Into a Reach in the Watershed Defined by the Joint Submittal**

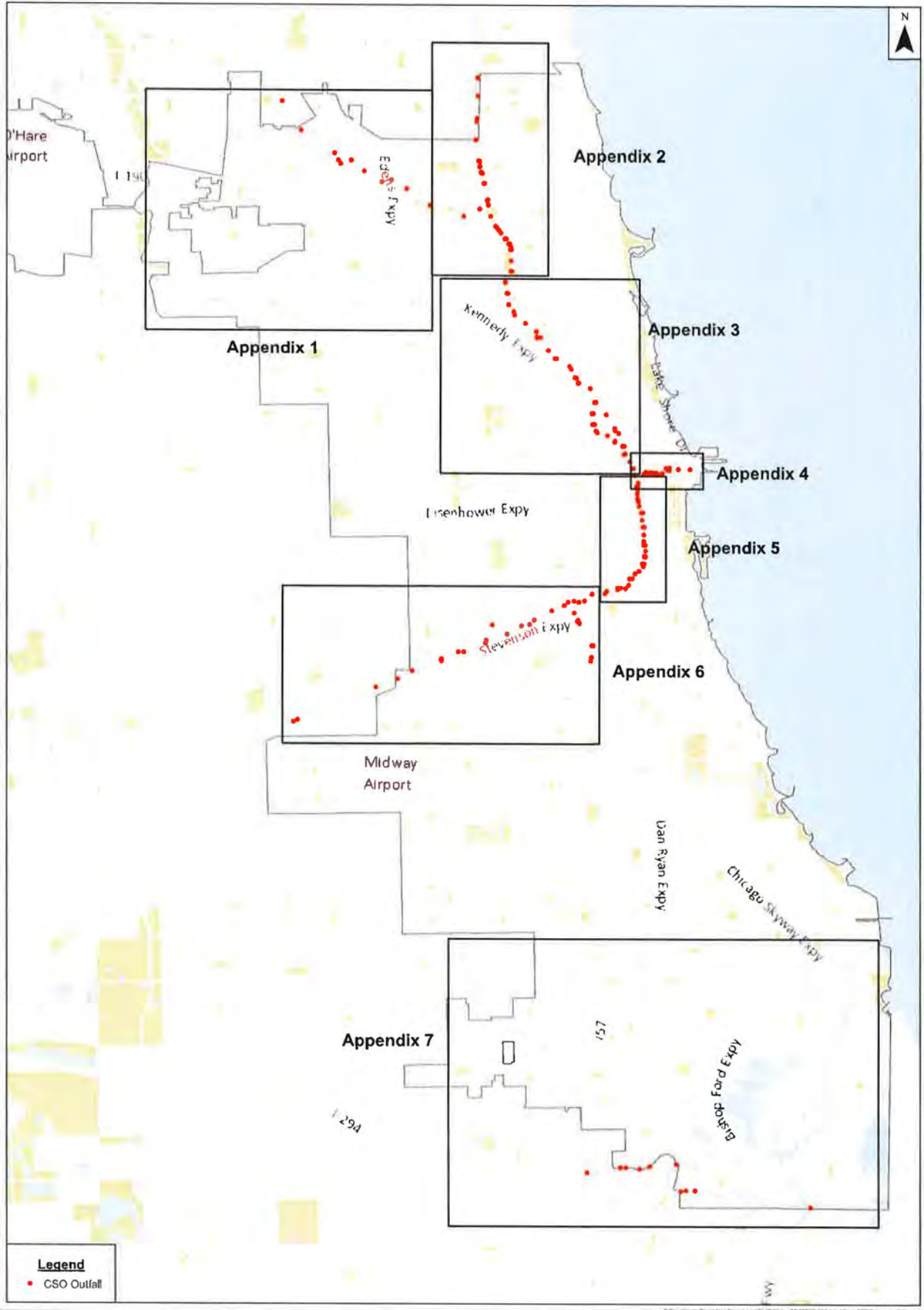


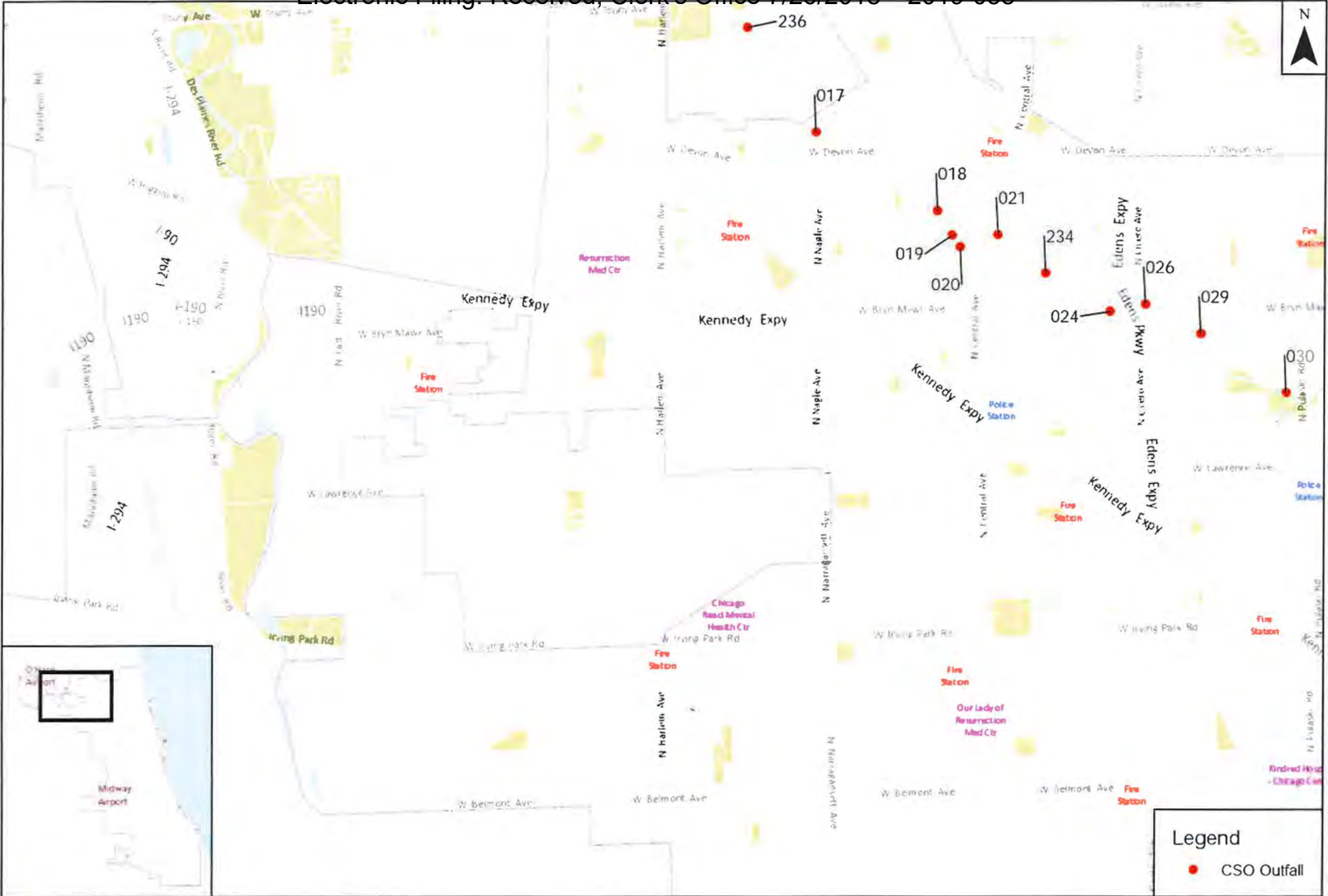
Department of Water Management
Randy Connor, Commissioner

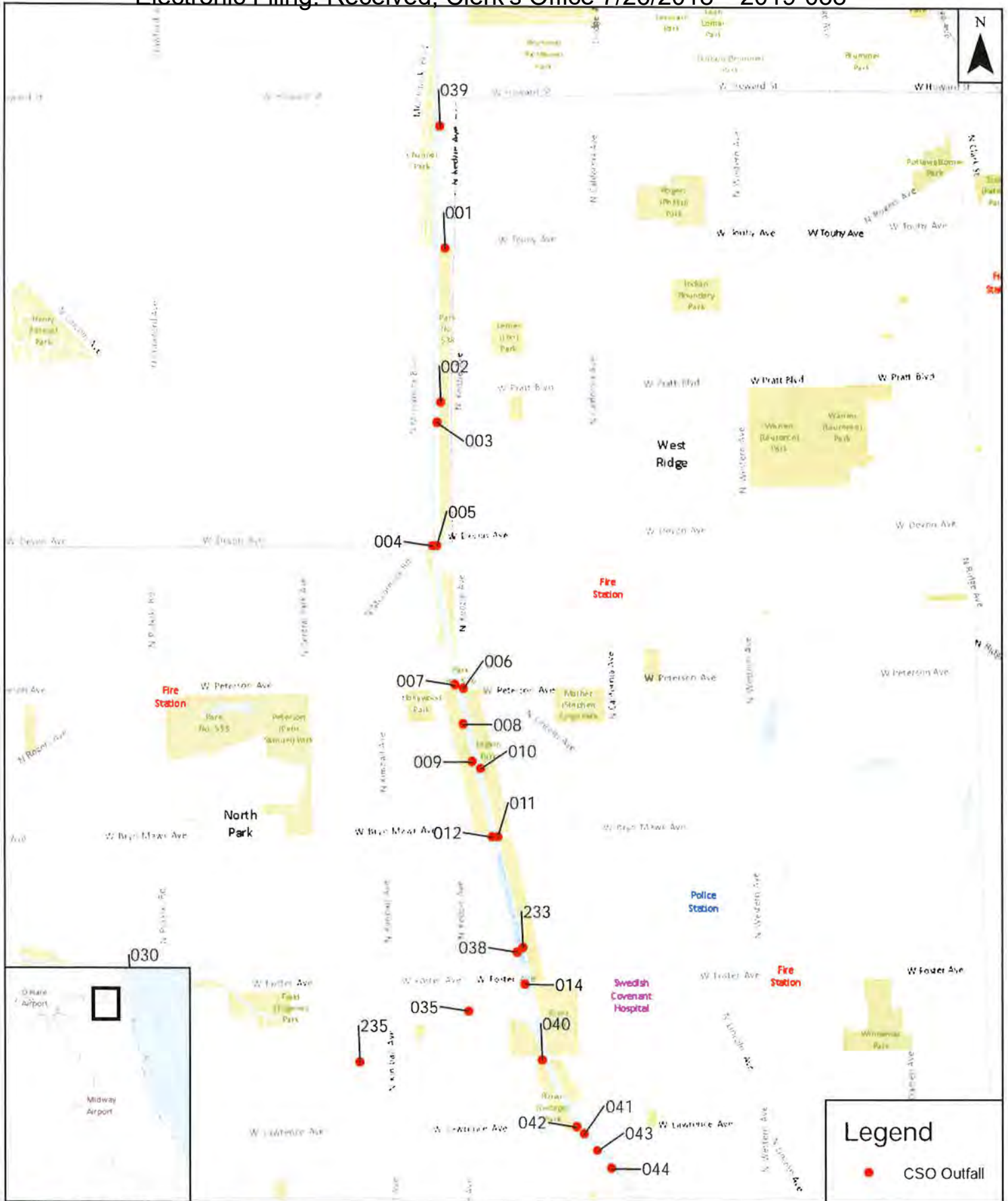
CSO Outfalls Discharging to Applicable Waterways



City of Chicago
Rahm Emanuel, Mayor



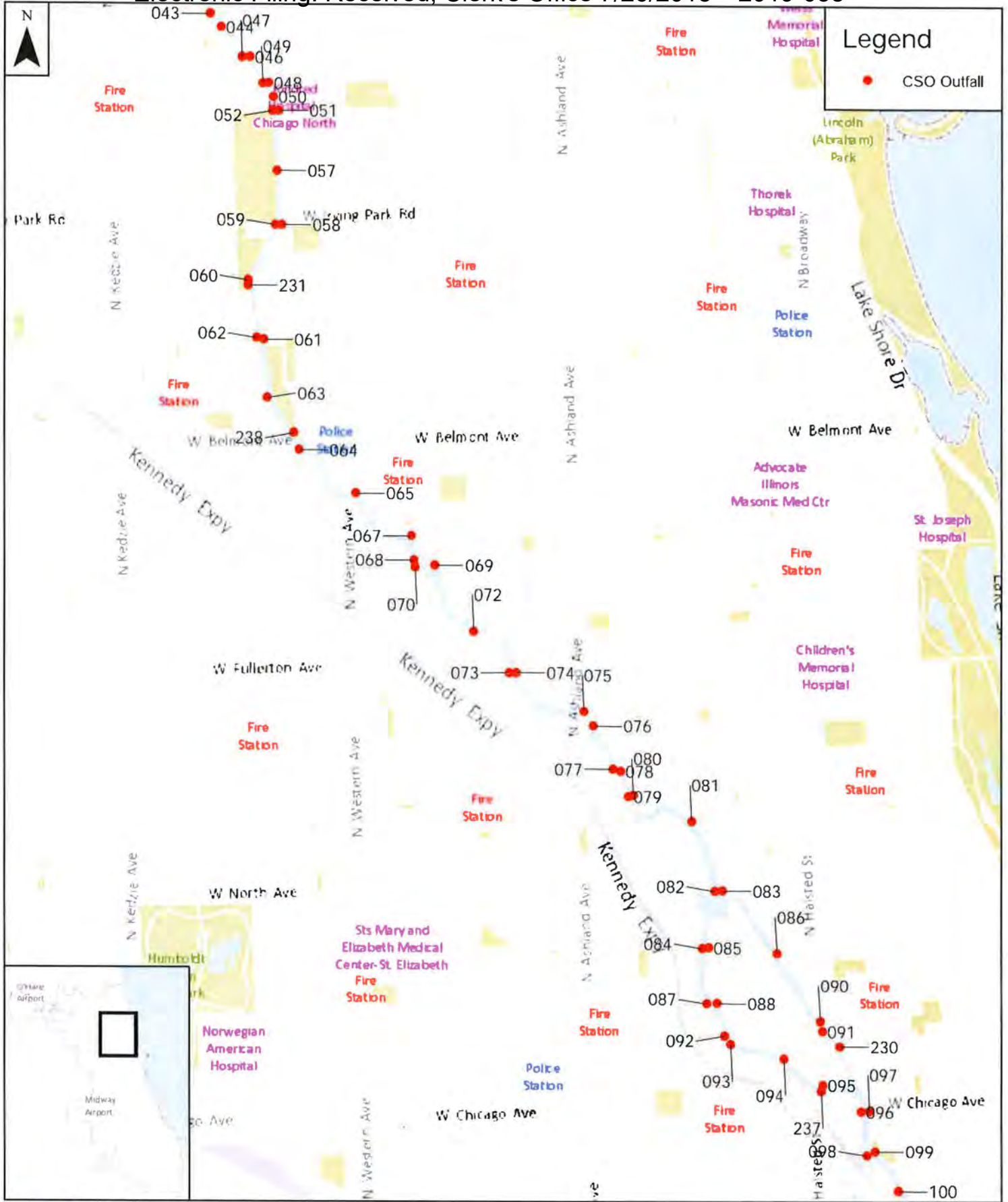




**City of Chicago
Department of Water Management**



**CSO Outfalls Discharging to Applicable Waterways
Appendix 2**

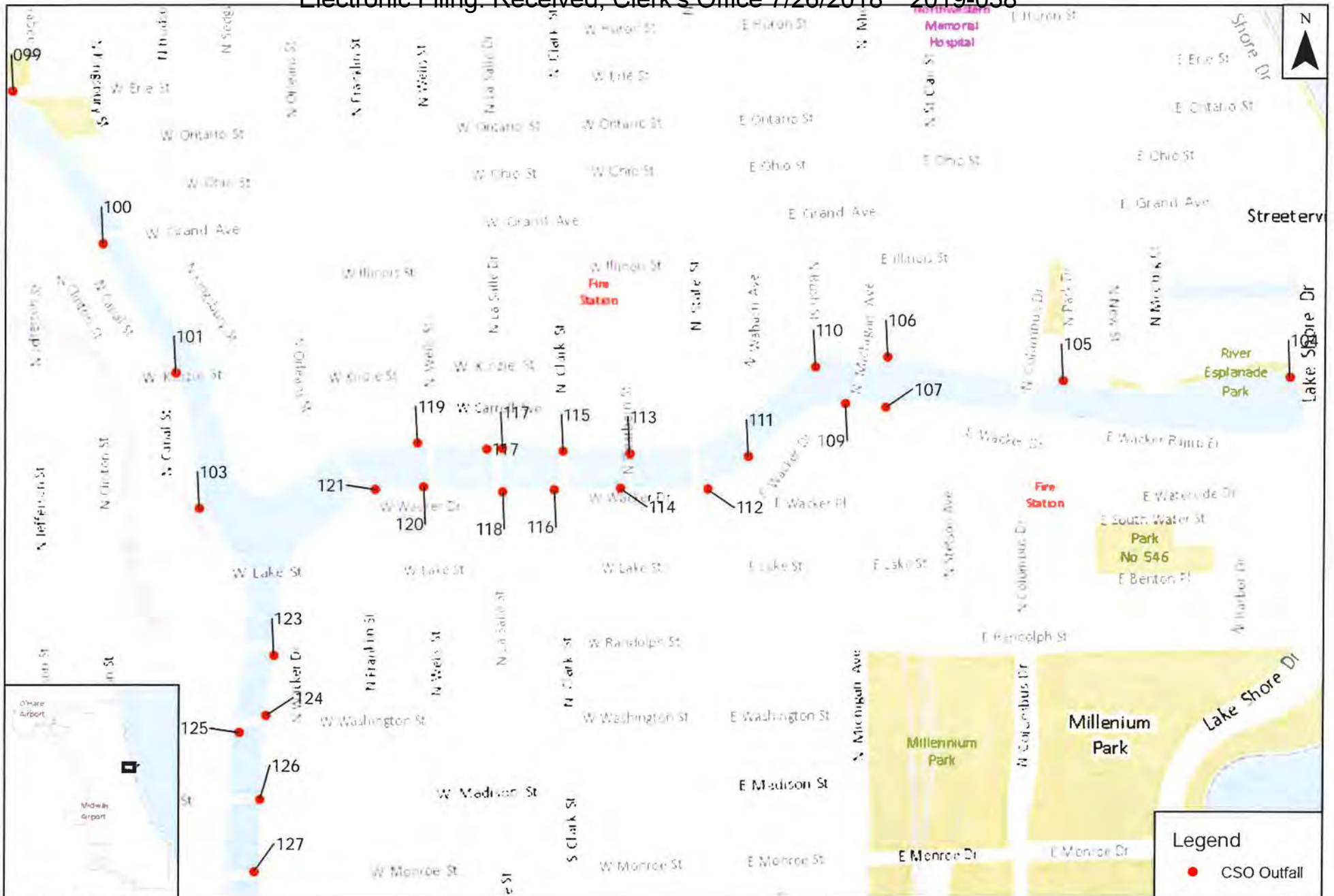


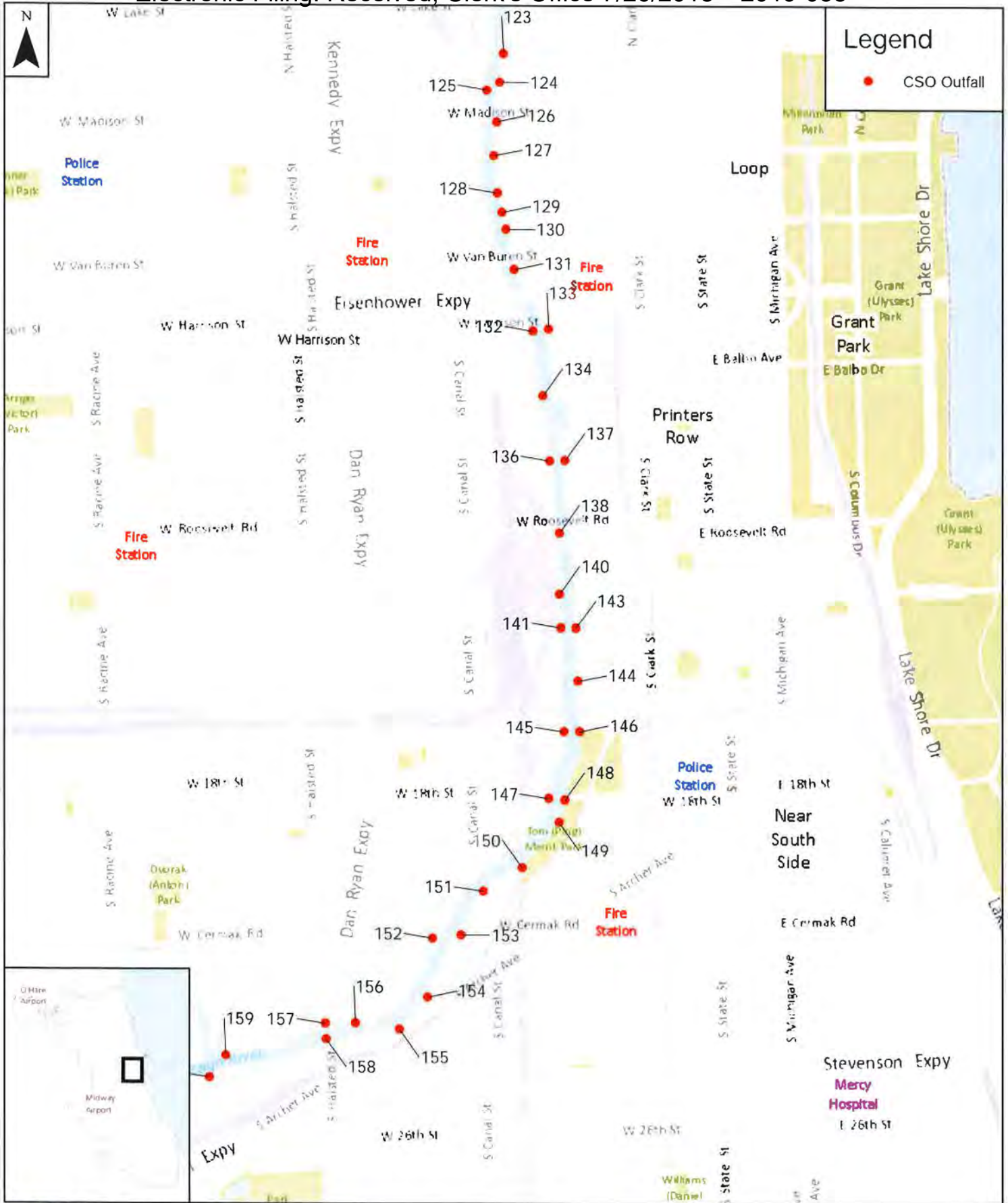
City of Chicago

Department of Water Management

CSO Outfalls Discharging to Applicable Waterways

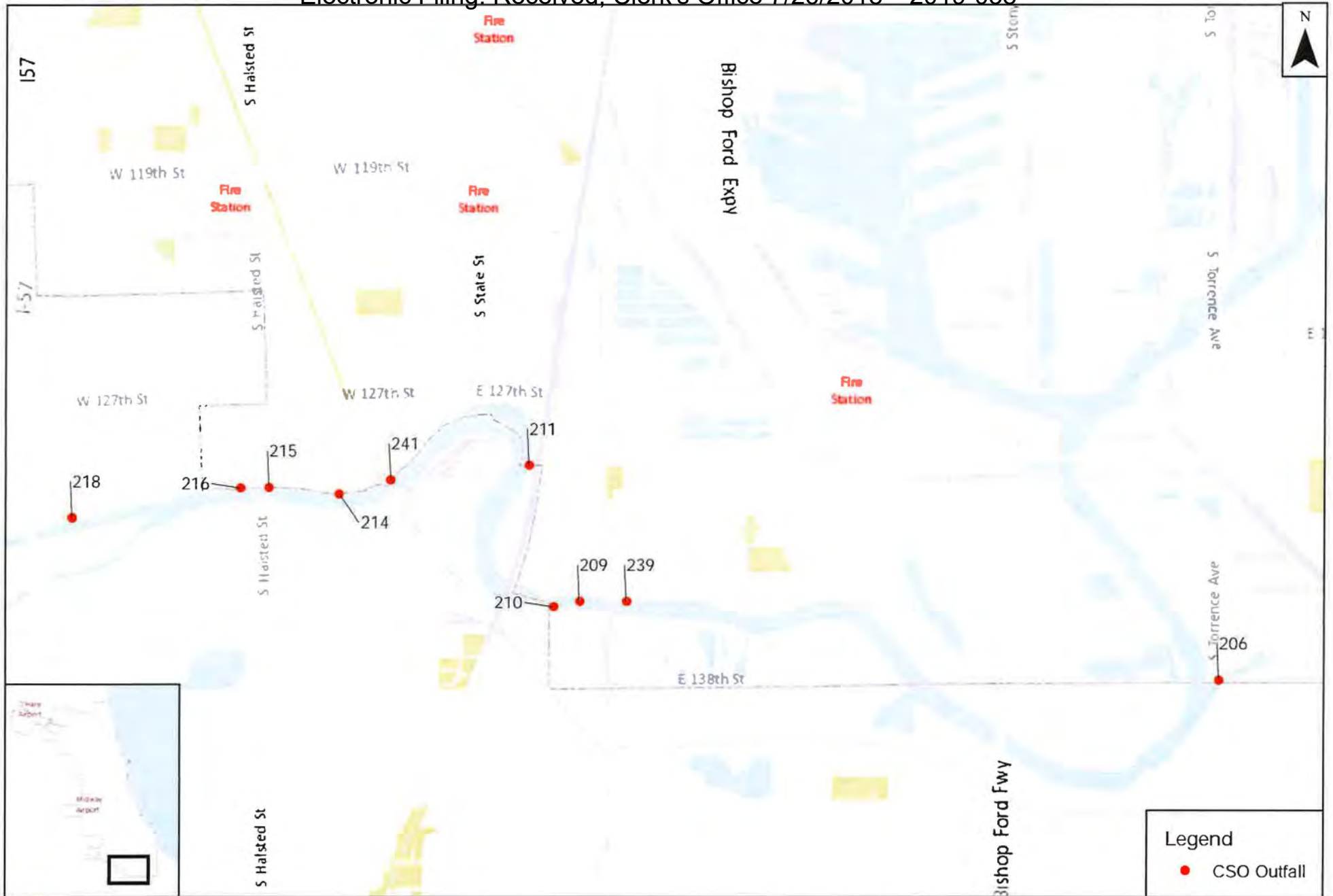
Appendix 3





City of Chicago
Department of Water Management
CSO Outfalls Discharging to Applicable Waterways
Appendix 5





Attachment in Response to Question 12: Past or Currently In-Use BMPs at the Facility for Minimizing the Discharge of Chlorides

DEICING AND SNOW REMOVAL BEST MANAGEMENT PRACTICES

The Chicago Area Waterways (CAWS) Chloride Reduction Initiative Workgroup is seeking information on Best Management Practices (BMPs) for Snow and Ice Removal. The goal of this brief survey is to determine 1) what BMPs are currently performed on a routine basis by various entities within the watershed; and 2) what BMPs that an entity is willing to perform in addition to those BMPs currently practiced. This information will help to develop the variance petition currently being drafted for submittal to the Illinois Pollution Control Board (IPCB).

Please take a few moments to complete this survey. The variance petition will be drafted based on the responses received from this document. **This is your opportunity to have a voice in any regulatory requirements that result from the petition and subsequent decisions by the IPCB.**

Please return the completed survey to Kristie Rodocker by January 27, 2017, via mail, e-mail or fax:

MWRDGC
100 East Erie Street
Chicago, IL 60611

Fax: (312) 751-5145
kristie.rodocker@mwrdd.org

Municipality: City of Chicago _____

Agency: Chicago Department of Streets & Sanitation _____

Industry: _____

Receiving Stream: _____

Contact Name: Cole Stallard Contact #: 312-744-5911 _____

Contact Email: cole.stallard@cityofchicago.org

Listed below are several categories of BMPs for Snow and Ice Removal. Please review each one and check off those BMPs that your organization currently performs on a regular basis. In addition, please check whether your organization would be willing to perform these BMPs on a regular basis if you are not already doing so.

	<u>Currently Implement</u>			<u>Will Implement</u>	
	<u>Yes</u>	<u>No</u>		<u>Yes</u>	<u>No</u>
Salt Storage					
1. Impervious Pad ¹	<u> X </u>	<u> </u>	(in process)	<u> X </u>	<u> </u>
2. Pile Completely Covered ²	<u> X </u>	<u> </u>		<u> </u>	<u> </u>
3. Runoff Containment ³	<u> X </u>	<u> </u>		<u> </u>	<u> </u>
4. Indoor Storage ⁴	<u> X </u>	<u> </u>	(some sites)	<u> </u>	<u> </u>
5. Good housekeeping	<u> X </u>	<u> </u>		<u> </u>	<u> </u>
6. Level loading Areas	<u> X </u>	<u> </u>		<u> </u>	<u> </u>

¹ Currently, approximately 40% of the 19 salt pads used by the Chicago Department of Streets & Sanitation (DSS) have impervious pads.

² Currently, 7 of 19 DSS salt pads contained in a salt dome, the remainder tarped.

³ Runoff containment provided by domes, for salt in salt domes; for non-domed pads, Jersey blocks around piles provide control runoff.

⁴ Currently, 7 salt pads are contained in salt domes, out of total of 19 salt pads.

Pre-Wetting⁵ ___ ___ ___

Anti-Icing⁶ ___ ___ ___

Variable Application Rates accounting for:

- 1) Pavement temperature ___ ___ ___
 - 2) Precipitation rate/type ___ ___ ___
 - 3) Level of Service ___ ___ ___
 - 4) Cycle Time ___ ___ ___
 - 5) Use Ground Speed ___ ___ ___
- Controllers

Calibration

- 1. Before Winter Season ___ ___ ___
- 2. Regular schedule⁷ ___ ___ ___
- 3. Upon change in material⁸ ___ ___ ___

Measurement

- 1) Condition of Road vs. Severity of Storm ___ ___ ___
- 2) Track salt usage per event for each operator ___ ___ ___
- 3) Salt usage overall ___ ___ ___
- 4) Snowfall per event ___ ___ ___
- 5) Total seasonal snowfall ___ ___ ___
- 6) Average salt use per lane-mile⁹ ___ ___ ___ ___
- 7) Instrumentation to determine grip of road¹⁰ ___ ___ ___
- 8) Determine accuracy of forecasts ___ ___ ___
- 9) Document if level of service(s) were achieved¹¹ ___ ___ ___

Accountability

⁵ In very cold temperatures, DSS will pre-wet salt before application, depending on temperature, to reduce bounce and scatter and to activate salt (to prevent snow and ice bonding).

⁶ DSS pre-wets bridges, overpasses, Lakeshore Drive and Stony Island. 20,000 Gallons of beet juice normally employed per event.

⁷ Calibration before de-icing season, and whenever trucks go in for service.

⁸ Calibration when changing between beet juice, salt, or combination of both.

⁹ The City has developed the capacity to track per-mile salt use, but currently has not activated.

¹⁰ Lasers installed on bridges, overpasses and Lakeshore Drive at 12 locations to determine dew point, grip level, ground temperature, air temperature and status of bridges at the time (wet, moist, icy, dry).

¹¹ Track complaints (Customer Service Requests), develop heat maps based on CSR data to determine where issues are.

1) Plan developed and guidelines followed ¹²	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Plan and guidelines distributed to all crew and staff ¹³	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Liquid Usage¹⁴	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No Salt Usage unless treated at temps below 15 degrees F and greater than 0 degrees F¹⁵	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of materials that promote traction at temps below 0 degrees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Use of Forecasting Services¹⁶	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training for all appropriate staff¹⁷	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Outreach (if municipality)				
1) Offer classes for citizens/private applicators	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Promotes clear message ¹⁸	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Application				
1) Use mechanical removal asap and throughout storm	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Use of methods to reduce bounce and scatter:				
a. Reduce speed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Higher liquid to granular ratio	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Lower spinner elevation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Chutes or skirts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Reduced spinner speed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Target center of road	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹² Train staff and advise via radio during events, and have follow-up observations by supervisors to assess application.

¹³ Plans and guidelines distributed through DSS training program and radio.

¹⁴ Use beet juice.

¹⁵ Will treat where needed, to prevent bounce and scatter.

¹⁶ Use AccuWeather service.

¹⁷ Starting in May of each year, DSS distributes information on snow and de-icing, with meetings of various sizes with operators, and distributes information via printed handouts.

¹⁸ Public outreach primarily conducted through news media.

What makes your chosen options attractive? DSS makes an effort to implement strategies that promote the safe and efficient use of salt. DSS favors strategies that protect the environment, and are both cost-effective and operationally effective.

What prevents you from implementing other options? DSS is unable to consider options that are cost prohibitive.

Other Comments:

Other BMPs not included on the form which DSS is implementing or could consider for implementation in the future include:

1. Moving salt piles further away from waterways.
2. Increased frequency of calibration of road salt application equipment.
3. Increased training regarding road salt use.
4. Increased use of beet juice.
5. Use of lasers installed on roadways to provide real-time information regarding dew point, grip level, ground temperature, air temperature and status of roadway.
6. Review and update O&M guidelines relating to road salt use.
7. Increased efforts to measure and track implementation of BMPs and assess their impacts.
8. Increased efforts to check and clean equipment before/after use to identify any leaks, remove excess salt, etc.

Thank you for your feedback!