

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO:) R18-32
) (Rulemaking – Water)
35 ILL. ADM. CODE 302.102 and 302.208(g))
WATER QUALITY STANDARDS FOR)
CHLORIDES)

NOTICE OF ELECTRONIC FILING

PLEASE TAKE NOTICE that on January 16, 2019, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, **THE ILLINOIS CHAPTER OF THE SIERRA CLUB'S PRE-FILED QUESTIONS FOR JAMES E. HUFF**, a copy of which is attached hereto and herewith served upon you.

Dated: January 16, 2019

Respectfully Submitted,



Stacy Meyers
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**THE ILLINOIS CHAPTER OF THE SIERRA CLUB’S PRE-FILED QUESTIONS FOR
JAMES E. HUFF**

Questions re: Pre-Filed Testimony

1. Page 1: What alternative to chloride have you considered in addition to sand-salt?
2. Page 2: Is the current 500 mg/L standard a chronic standard or a “not to be exceeded” criteria? How is it currently handled in permits by IEPA?
3. Page 3: What is the basis for your statement that, as to impaired waters, “any future growth involving additional roadways, parking lots, or driveways, will be virtually impossible”?
4. Page 4: Please detail the documents and studies that are the basis for the conclusion that “summer values of less than 200 mg/L appear more important in supporting benthic communities.”
5. Page 8:
 - Was any consideration given to water bodies south of I-80?
 - What consideration was given to the duration of high chloride levels in non-urban waters?
 - What consideration was given to early life states of endangered species, including those of endangered mussels?
6. Page 10: Please show us the mathematical calculation that led to the acute proposal of 1,010 mg/L.
7. Page 13: How is it anticipated that the standard can be exceeded once every three years on average will affect NPDES permit writing?

Questions re: Statement of Reasons

1. Page 2:
 - Can you elaborate on why you consider the fact that elevated winter chloride levels are present in waterways with moderately impacted aquatic communities “support the position that elevated winter concentrations are less destructive to aquatic communities?”
 - What do you consider sufficient monitoring to determine that streams that are currently not listed as impaired due to chlorides are actually unimpaired, as you contend?

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2. Page 4:
 - Please explain the intent of the second sentence in your proposed Sec. 302.214(b)(ii).
 - Why did you include a ZID exception in Sec. 302.214(a)(ii)?
3. Page 5:
 - Sec. B – What chronic chloride water quality criteria are you referring to in the last sentence?
 - Sec. D
 - You raise the issue of the need for a spring standard for water temperatures near 15 C. Do you have plans to test organisms at this temperature and make a proposal for a standard?
 - Please elaborate on the issues related to spring months that you wish to explore during these proceedings.
4. Page 6:
 - Have you compiled the data to show that de-icing chloride spikes are less than 96-hour episodic events as stated?
 - Please explain the statement that “if exposure is extended chronic effects can be observed, but at higher chloride concentrations of exposure.”
 - Regarding the *C. dubia* 96-h chronic toxicity testing at 10 C, did all chronic indicators show no change, independent of chloride levels?
 - Regarding Illinois stream temperature data, did you evaluate:
 - The months of Dec – April independently? What were the results for March and April as compared to the winter months?
 - Based on the streams’ latitude?

Questions re: Technical Support Document

1. Has your proposal taken into account the variability of hardness across the state?
2. Page 4:
 - At what temperature do mayfly hatch?
 - At what temperature do fingernail clams start to reproduce?
3. Page 5: You state that “eliminating April from the temperature dataset reducing the 75%ile to 5.9 C.” What is the 75%ile for April data alone?
4. Page 13, Sec. 5.1: Were tests done in anything other than moderately hard water?
5. Page 14, Sec. 5.1: Aren’t there conditions in which chlorides could be elevated in Illinois streams longer than 35 days?
6. Page 15, Sec. 5.4: What ‘strain’ of *Hyalella* is likely to be present in southern Illinois?

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CERTIFICATE OF SERVICE

I, Stacy Meyers, hereby certify that I have filed the attached **NOTICE OF ELECTRONIC FILING** and **THE ILLINOIS CHAPTER OF THE SIERRA CLUB'S PRE-FILED QUESTIONS FOR JAMES E. HUFF** upon the attached service list by electronic mail on January 16, 2019.

Dated: January 16, 2019

Respectfully Submitted,



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PCB R2018-032 SERVICE LIST

January 2019

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