

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CATERPILLAR INC.,	)	
Petitioner,	)	
	)	
v.	)	PCB 2019-011
	)	
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
Respondent	)	
	)	

APPEARANCE

I hereby file my appearance in this proceeding, on behalf of Caterpillar Inc.

/s/ Charles R. Anthony III

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Attorney's Name

Attorney - Environmental, Health, and Safety | Legal Services

Law, Security, & Public Policy

Caterpillar Inc.

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**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: Caterpillar, Inc.
2. Owner/Operator of Facility: Caterpillar, Inc.
3. Address of Facility: 2200 Channahon Road, Joliet, IL 60434
4. Contact Information for Facility's Responsible Official:  
Name: Anthony Apostolou Title: Engineering Manager  
Mailing Address: 2200 Channahon Road, Joliet, IL 604  
Phone Number: 815-729-6259 Email: Apostolou\_Anthony\_M@cat.com
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): IL0001732

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): 001, 002, 003, 004

b. General description of outfall location:

The outfalls are located on the north bank of the Des Plaines River, west of the Brandon Road Locks. They are concrete, installed circa 1950s.

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.

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**Facility-Specific TLWQS Requirements**

11. The Facility agrees to implement all of the Best Management Practices ("BMPs") included for the LDPR 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.

Cat-Joliet Stormwater Pollution Prevention Plan (SWPPP) is currently in use.

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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:

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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

Question 14 continued:

The Facility agrees to develop the described PMP no later than six months after the effective date of the TLWQS, though the Facility will need to continue applying salt to its parking areas, walkways, and roadways during the winter months due to safety concerns presented by the potential for ice were salt not used.

**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*)

Charles R. Anthony, Attorney - EHS

Signature



Date Signed

7/26/18

CERTIFICATE OF E-MAIL SERVICE

I, the undersigned, on oath state the following:

That I have served the attached 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 by e-mail upon:

[chris@CJCummingsLaw.com](mailto:chris@CJCummingsLaw.com);  
[Stefanie.diers@illinois.gov](mailto:Stefanie.diers@illinois.gov);  
[sara.terranoval@illinois.gov](mailto:sara.terranoval@illinois.gov);  
[ettinger.albert@gmail.com](mailto:ettinger.albert@gmail.com);  
[don.brown@illinois.gov](mailto:don.brown@illinois.gov);  
[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov);  
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[eklavery@ktjlaw.com](mailto:eklavery@ktjlaw.com);  
[ekfriker@ktjlaw.com](mailto:ekfriker@ktjlaw.com);  
[pmmlawyer@aol.com](mailto:pmmlawyer@aol.com);  
[Katherine.Hodge@heplerbroom.com](mailto:Katherine.Hodge@heplerbroom.com);  
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[ASamuelson@rmcj.com](mailto:ASamuelson@rmcj.com);  
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[andrew.fiske@hklaw.com](mailto:andrew.fiske@hklaw.com);  
[hart.passman@hklaw.com](mailto:hart.passman@hklaw.com);  
[rrinchich@oak-forest.org](mailto:rrinchich@oak-forest.org);

My e-mail address is \_\_\_\_\_ .  
anthony\_charles\_r@cat.com

That the number of pages in the e-mail transmission is  
an attachment of 4 pages. \_\_\_\_\_

That the e-mail transmission took place before 5:00 p.m. on the date of \_\_\_\_\_ .  
July 26, 2018. \_\_\_\_\_

/s/ Charles R. Anthony III

July 26, 2018

(Source: Added at 39 Ill. Reg. 2276, effective January 27, 2015)