

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

METROPOLITAN WATER RECLAMATION)	
DISTRICT OF GREATER CHICAGO,)	
)	
Petitioner,)	
)	
v.)	PCB No. 2016-028
)	(Time-Limited Water
)	Quality Standard)
)	
ILLINOIS ENVIROMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

To: Don Brown, Clerk of the Board	Brad Halloran, Hearing Officer
Illinois Pollution Control Board	Illinois Pollution Control Board
James R. Thompson Center	James R. Thompson Center
100 West Randolph, Suite 11-500	100 West Randolph, Suite 11-500
Chicago, Illinois 60601	Chicago, Illinois 60601
Via Electronic Mail	Via Electronic Mail
(SEE PERSONS ON ATTACHED SERVICE LIST)	

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board ILLINOIS EPA'S PRE-FILED QUESTIONS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

Dated: November 27, 2019
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794

By: /s/ Stefanie N. Diers
Stefanie N. Diers
Assistant Counsel
Division of Legal Counsel

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

**METROPOLITAN WATER RECLAMATION
DISTRICT OF GREATER CHICAGO,**

Petitioner,

V.

PCB No. 2016-028
(Time-Limited Water
Quality Standard)

**ILLINOIS ENVIROMENTAL PROTECTION
AGENCY,**

Respondent.

ILLINOIS EPA'S PRE-FILED QUESTIONS

NOW COMES the Illinois Environmental Protection Agency (Illinois EPA or Agency), by and through one of its attorneys, ask the following pre-filed questions:

- 1) How often did combined sewer overflow (CSO) events happen in the Calumet System in 2017 and 2018?
- 2) What is the District doing to address these CSOs events?
- 3) On page 2 of the pre-filed testimony, Mr. Gallagher you state, “MWRD is making structural changes to the system that we believe will further reduce the likelihood of discharges form the Calumet CSO outfall that have had CSO discharges in recent years.” What are the structural changes being made by MWRD and how will those changes reduce the CSO discharges?
- 4) Has MWRD evaluated other measures to reduce the chance of future CSO discharges into the Calumet System? If so, what are those measures and what would they cost?
- 5) Has the number of CSOs decreased in Calumet System since the Thornton Composite Reservoir became operational in November 2015?

- 6) Has the results of the dissolved oxygen monitoring improved since the Thornton Composite Reservoir became operational in November 2015?
- 7) How much would it cost the District to eliminate all discharges from CSOs in the Calumet System?
- 8) What is limiting the aquatic life in the Calumet System now that CSO events have been reduced to once per year?
- 9) Does the Calumet system have dissolved oxygen issues other than during or after CSOs events?
- 10) According to the executive summary (page xii), the dissolved oxygen water quality standard compliance was 90 percent. For the 10% that was not compliant, what percentage was due to wet-weather conditions with CSOs?
 - a) What percentage was due to wet-weather conditions without CSOs?
 - b) Were there other causes of depressed dissolved oxygen?
 - c) Does the District plan on continuing its continuous dissolved oxygen monitoring program in the Calumet System?
 - d) Could data from the continuous dissolved oxygen monitoring program be used to identify additional causes of depressed dissolved oxygen?
 - e) What measures other than additional CSO control could be taken to remedy depressed dissolved oxygen?
 - f) What is the District's plan to remedy the depressed dissolved oxygen?
 - g) What will it cost to remedy the depressed dissolved oxygen during times other than "wet-weather conditions with CSOs?"
 - h) What interim measures to address the current water quality issues are happening in the Chicago Area Waterway System waters and Lower Des Plaines River Segments?

11) Have the results of the dissolved oxygen monitoring improved since the Thornton Composite Reservoir became operational?

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

By: /s/Stefanie N. Diers

Stefanie N. Diers

Assistant Counsel

Division of Legal Counsel

Date: November 27, 2019

Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

CERTIFICATE OF SERVICE

I, STEFANIE N. DIERS, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING and ILLINOIS EPA'S PRE-FILED QUESTIONS, upon persons listed on the Service List, by sending an email from my email account (Stefanie.diers@illinois.gov) to the email addresses designated below with the following attached as a PDF document in an e-mail transmission on or before 5:00 pm on November 27, 2019.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Stefanie Diers
Stefanie Diers
Assistant Counsel
Division of Legal Counsel

DATED: November 27, 2019

1021 N. Grand Ave. East
P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

Service List

Don Brown, Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
Don.brown@illinois.gov

Brad Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
brad.halloran@illinois.gov

Albert Ettinger
53 W. Jackson
Suite 1664
Chicago, IL 60604
Ettinger.albet@gmail.com

Stacy Meyers
25 E. Washington Street
Suite 1650 Chicago,
IL 60602
smeyers@openlands.org

Dave Pfeifer
USEPA Region V
Pfeifer.david@epa.org

Margaret Conway
100 E. Erie Street
Chicago, IL 60611
Margaret.conway@mwr.org

Fredric Andes
Barnes and Thornburg, LLP
One Wacker Drive Suite
4400
Chicago, IL 60606
Fredric.andes@btlaw.com

Aaron Johnson
USEPA Region V
Johnson.aaronk@epa.gov

Jared Policicchio
City of Chicago
30 N. LaSalle Street
Chicago, IL 60602
Jared.policicchio@cityofchicago.org