Electronic Filing: Received, Clerk's Office 09/22/2026

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF FRANKFORT, IL,	)	
	)	
	)	
Petitioner,	)	
	)	
v.	)	**PCB No. 2026--048**
	)	**(Variance – Water)**
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
	)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on September 22, 2026, we electronically filed with the Clerk of the Illinois Pollution Control Board the Village of Frankfort Response to Illinois EPA's Recommendation, a copy of which are attached hereto and served upon you.

Dated: September 22, 2026

Respectfully submitted,

VILLAGE OF FRANKFORT, ILLINOIS

By: */s/ Fredric P. Andes*
Fredric P. Andes

Fredric P. Andes
BARNES & THORNBURG LLP
Suite 4400
One North Wacker Drive
Chicago, Illinois 60606
Phone: (312) 357-1313
Email: fredric.andes@btlaw.com

CERTIFICATE OF SERVICE

I, Fredric Andes, hereby certify that I have filed the attached Notice of Filing and the Village of Frankfort Response to Illinois EPA's Recommendation the below service list by electronic mail on September 22, 2026.

Dated: September 22, 2026 */s/ Fredric Andes*

SERVICE LIST

Sara Terranova Kaitlyn Hutchison Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794 sara.terranova@illinois.gov Kaitlyn.hutchison@Illinois.gov	Don Brown, Clerk of the Board Illinois Pollution Control Board 60 E. Van Buren Street, Suite 630 Chicago, IL 60605 Don.brown@illinois.gov
Vanessa Horton Chloe Salk Hearing Office Illinois Pollutions Control Board 60 E. Van Buren Street, Suite 630 Chicago, IL 60605 Vanessa.Horton@illinois.gov Chloe.Salk@Illinois.gov	Kathy Roeder Life Scientist, MPA, MSES Water Quality Standards Section Watersheds and Wetlands Branch Water Division, U.S. EPA Region 5 77 W. Jackson Blvd Chicago, IL 60604 Roeder.Katherine@epa.gov
Taylor Desgrosseilliers Assistant Attorney General Environmental Bureau Office of the Illinois Attorney General 115 S. LaSalle St. Chicago, IL 60603 T.Desgrosseilliers@ilag.gov	Aaron Johnson USEPA Region 5 77 W. Jackson Blvd. WQ-16J Chicago, IL 60604 Email: johnson.aaronk@epa.gova

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	)	**(Variance – Water)**
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	)	
	)	

VILLAGE OF FRANKFORT RESPONSE TO
ILLINOIS EPA'S RECOMMENDATION

The Village of Frankfort ("Village"), by its attorneys Barnes & Thornburg LLP, and under 35 IAC 104.550(c), hereby responds to the Illinois EPA's Recommendation in this matter.

In the Recommendation, Illinois EPA states as follows (on pages 7-8):

> "Notably, the Petition contains a technical error in its characterization of the residual streams associated with the evaluated potable source-water treatment alternatives (*i.e.*, ion-exchange, lime softening, and reverse osmosis (RO)). Specifically, the Petition states that all three potable source water treatment options would create concentrated briny, chloride-laden residual waste streams with no effective or practical method of treatment and disposal. *See* Petition at I.C.2. However, residuals generated by ion exchange, lime softening, and RO differ substantially in composition and should not be uniformly characterized as chloride-laden brines. Lime softening produces mineral solids (primarily calcium carbonate and magnesium hydroxide) and does not concentrate chloride. Ion exchange may generate chloride-bearing regenerant depending on resin type and regeneration chemistry. Reverse osmosis does not create chloride; it concentrates constituents already present in the source water. Therefore, describing all three processes as producing concentrated chloride brine streams is not technically accurate. See Exhibit 7. Furthermore, because Frankfort's groundwater does not contain elevated chloride levels, the resulting RO concentrate would not be expected to represent any significant chloride-disposal concerns associated with ion-exchange regeneration. See Exhibit 3.
>
> The Petition should clarify that the primary chloride-generation concern is associated with ion exchange softening, where sodium chloride is used during resin regeneration and results in a chloride-containing waste stream. Nevertheless, the economic argument is addressed later in this section."

The Village responds as follows:

While it is correct that, among the potable water treatment technologies evaluated (ion exchange, reverse osmosis, and lime softening), only a system-wide ion exchange softening process would generate a concentrated chloride-laden waste stream, the Village also evaluated reverse osmosis treatment at the wastewater treatment plant. Reverse osmosis treatment of wastewater would likewise produce a concentrated chloride-laden waste stream. Both concentrated chloride wastestreams would create significant disposal challenges. If it would be helpful, the Village can revise the petition to more specifically identify the treatment technologies that generate concentrated chloride-laden wastestreams.

Dated: September 22, 2026

Respectfully submitted,

VILLAGE OF FRANKFORT, ILLINOIS

By: */s/ Fredric P. Andes*
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Fredric P. Andes
BARNES & THORNBURG LLP
Suite 4400
One North Wacker Drive
Chicago, Illinois 60606
Phone: (312) 357-1313
Email: fredric.andes@btlaw.com