

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

CITY OF PALOS HEIGHTS,

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Petitioner,

PCB 2016-014

v.

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,

Respondent.

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on July 25, 2018, the City of Palos Heights electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **APPEARANCE**, a copy of which is hereby served upon you.

Dated: July 25, 2018

Respectfully submitted,
CITY OF PALOS HEIGHTS,

By: /s/ Dennis G. Walsh
One of Its Attorneys

Dennis G. Walsh
KLEIN, THORPE AND JENKINS, LTD.
20 N. Wacker Drive
Suite 1660
Chicago, Illinois 60606
(312) 984-6400
DGWALSH@KTJLAW.COM

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that today I have filed with the Office of the Pollution Control Board electronically a copy of this Notice and the attachment(s), a copy of which is herewith served upon you by depositing same in the U.S. Mail at 20 N. Wacker Drive, Suite 1660, Chicago, IL 60606 at or before 5:00 p.m., on July 26, 2018.

/s/ Dennis G. Walsh

Service List

Bradley P. Halloran
Hearing Officer
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Chicago, IL 60601

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PCB 2016-014

APPEARANCE

Now come the undersigned attorneys, KLEIN, THORPE AND JENKINS, LTD., and hereby enter their Appearance on behalf of the Petitioner, CITY OF PALOS HEIGHTS.

Dated: July 25, 2018

Respectfully submitted,
CITY OF PALOS HEIGHTS,

By: /s/ Dennis G. Walsh
One of Its Attorneys

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PCB 2016-014

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on July 25, 2018, the City of Palos Heights electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **INDIVIDUAL SUBMITTAL IN SUPPORT OF PETITION FOR CHLORIDE TIME-LIMITED WATER QUALITY STANDARD FOR THE DEFINED CHICAGO AREA WATER SYSTEM/DES PLAINES RIVER WATERSHED**, a copy of which is hereby served upon you.

Dated: July 25, 2018

Respectfully submitted,
CITY OF PALOS HEIGHTS,

By: /s/ Dennis G. Walsh
One of Its Attorneys

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/s/ Dennis G. Walsh

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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: City of Palos Heights Public Works
2. Owner/Operator of Facility: City of Palos Heights
3. Address of Facility: 7607 West College Drive, Palos Heights, Illinois 60463
4. Contact Information for Facility's Responsible Official:
Name: Scott Smith Title: Director of Public Works
Mailing Address: 7607 West College Drive, Palos Heights, Illinois 60463
Phone Number: (708) 861-1806 Email: ssmith@palosheights.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): NPDES MS4 Permit Number ILR400417

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): 4

b. General description of outfall location:

Lake Katherine, Najavo Creek, Lake Arrowhead, Cal-Sag Channel

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/Salt Storage 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.

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)

SCOTT SMITH DIRECTOR OF PUBLIC WORKS

Signature

Scott Smith ^{KS}

Date Signed

July 25, 2018

Item 12: Facility BMPs

- Salt is stored on an impermeable pad.
 - The impermeable pad is constructed to avoid drainage onto the pad and a collection point for drainage exists.
 - Salt piles are covered at all times.
 - The salt pile areas are regularly scraped. To this point, a broom attachment has been purchased for the skid-steer to be utilized after storms.
 - The road salt can be pre-wetted prior to use. Currently, the majority of the salt is treated as it is being loaded onto the trucks.
 - More equipment will be purchased in the future and utilized to measure the pavement temperature. The equipment will be purchased before the winter season.
-
- Protocol is in place to vary the salt application rate based on pavement temperature, existing weather conditions, and forecasted weather conditions.
 - Salt quantity used and storm conditions are tracked and recorded for each storm. These records are kept at the Public Works Department.
 - Employees undergo annual training.
 - Prior to the winter season, all vehicles will be properly calibrated for both dry and liquid products.
 - Trucks are washed indoors and the drainage runs to the sanitary sewer system.
 - Aggregate material stockpiles are stored indoors.
 - All used oil is recycled through Allied Waste; Allied sorts all trash at their facility. Spill kits are located around the yard and a containment plan is in place.
 - A vehicle idling policy is in place.
 - As lights require replacing, they are upgraded to LED lighting and motion switches are installed where possible.