

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD)	
ILLINOIS, VILLAGE OF ORLAND PARK,)	
ORLAND PARK ILLINOIS, VILLAGE OF)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,)	
VILLAGE OF TINLEY PARK, TINLEY PARK)	
ILLINOIS, EXXONMOBIL OIL)	
CORPORATION, VILLAGE OF WILMETTE,)	
WILMETTE ILLINOIS, CITY OF COUNTRY)	
CLUB HILLS, COUNTRY CLUB HILLS)	
ILLINOIS, NORAMCO-CHICAGO, INC.,)	
FLINT HILLS RESOURCES JOLIET LLC,)	
CITY OF EVANSTON, EVANSTON ILLINOIS,)	PCB 16-14 (Homewood)
VILLAGE OF SKOKIE, SKOKIE ILLINOIS,)	PCB 16-15 (Orland Park)
ILLINOIS DEPARTMENT OF)	PCB 16-16 (Midlothian)
TRANSPORTATION, METROPOLITAN)	PCB 16-17 (Tinley Park)
WATER RECLAMATION DISTRICT OF)	PCB 16-18 (ExxonMobil)
GREATER CHICAGO, VILLAGE OF)	PCB 16-20 (Wilmette)
RICHTON PARK, RICHTON PARK)	PCB 16-21 (Country Club Hills)
ILLINOIS, VILLAGE OF LINCOLNWOOD,)	PCB 16-22 (Noramco-Chicago)
LINCOLNWOOD ILLINOIS, CITY OF OAK)	PCB 16-23 (Flint Hills Resources)
FOREST, OAK FOREST ILLINOIS, VILLAGE)	PCB 16-25 (Evanston)
OF LYNWOOD, LYNWOOD ILLINOIS,)	PCB 16-26 (Skokie)
CITGO HOLDINGS, INC., VILLAGE OF NEW)	PCB 16-27 (IDOT)
LENOX, NEW LENOX, ILLINOIS, CITY OF)	PCB 16-29 (MWRDGC)
LOCKPORT, LOCKPORT ILLINOIS,)	PCB 16-30 (Richton Park)
CATERPILLAR, INC., CITY OF CREST HILL,)	PCB 16-31 (Lincolnwood)
CREST HILL ILLINOIS, CITY OF JOLIET,)	PCB 16-33 (Oak Forest)
JOLIET ILLINOIS, MORTON SALT, INC.,)	PCB 19-7 (Village of Lynwood)
CITY OF PALOS HEIGHTS, PALOS)	PCB 19-8 (Citgo Holdings)
HEIGHTS ILLINOIS, VILLAGE OF)	PCB 19-9 (New Lenox)
ROMEOVILLE, ROMEOVILLE ILLINOIS,)	PCB 19-10 (Lockport)
IMTT ILLINOIS LLC, STEPHA CO.,)	PCB 19-11 (Caterpillar)
VILLAGE OF PARK FOREST, PARK FOREST)	PCT 19-12 (Crest Hill)
ILLINOIS, OZINGA READY MIX)	PCB 19-13 (Joliet)
CONCRETE, INC., OZINGA MATERIALS,)	PCB 19-14 (Morton Salt)
INC., MIDWEST MARINE TERMINALS LLC.)	PCB 19-15 (Palos Heights)
VILLAGE OF MOKENA, MOKENA)	PCB 19-16 (Romeoville)
ILLINOIS, VILLAGE OF OAK LAWN, OAK)	PCB 19-17 (IMTT Illinois)
LAWN ILLINOIS, VILLAGE OF DOLTON,)	PCB 19-18 (Stepan)
DOLTON ILLINOIS, VILLAGE OF)	PCB 19-19 (Park Forest)
GLENWOOD, GLENWOOD ILLINOIS,)	PCB 19-20 (Ozinga Ready Mix)
VILLAGE OF MORTON GROVE, MORTON)	PCB 19-21 (Ozinga Materials)
GROVE ILLINOIS, VILLAGE OF LANSING,)	PCB 19-22 (Midwest Marine)
LANSING ILLINOIS, VILLAGE OF)	PCB 19-23 (Mokena)
FRANKFORT, FRANKFORT ILLINOIS,)	PCB 19-24 (Oak Lawn)

VILLAGE OF WINNETKA, WINNETKA)	PCB 19-25 (Dolton)
ILLINOIS, VILLAGE OF LA GRANGE, LA)	PCB 19-26 (Glenwood)
GRANGE ILLINOIS, INOREDION, INC.,)	PCB 19-27 (Morton Grove)
VILLAGE OF CHANNAHON, CHANNAHON)	PCB 19-28 (Lansing)
ILLINOIS, COOK COUNTY DEPARTMENT)	PCB 19-29 (Frankfort)
OF TRANSPORTATION AND HIGHWAYS,)	PCB 19-30 (Winnetka)
VILLAGE OF NILES, NILES ILLINOIS,)	PCB 19-31 (La Grange)
SKYWAY CONCESSION COMPANY LLC,)	PCB 19-32 (Ingredion)
VILLAGE OF ELWOOD, ELWOOD)	PCB 19-33 (Channahon)
ILLINOIS, CITY OF CHICAGO, CHICAGO)	PCB 19-34 (CCDTH)
ILLINOIS, VILLAGE OF CRESTWOOD,)	PCB 19-35 (Niles)
CRESTWOOD ILLINOIS and VILLAGE OF)	PCB 19-36 (Skyway)
RIVERSIDE, RIVERSIDE ILLINOIS)	PCB 19-37 (Elwood)
)	PCB 19-38 (Chicago)
Petitioners,)	PCB 19-40 (Crestwood)
)	PCB 19-48 (Riverside)
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on April 16, 2019, the VILLAGE OF ORLAND PARK electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **Petitioner's Response To Recommendation of Illinois Environmental Protection Agency**, copies of which are hereby served upon you.

Respectfully submitted,

The Village of Riverside

/s/ Mark D. Goldrich

One of Petitioner's Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certified, under the penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **Petitioner's Response To Recommendation of Illinois Environmental Protection Agency** to be served via email transmittal from 20 N. Wacker Drive, Suite 1660, Chicago, Illinois 60606 on the 17th day of April, 2019 to the individuals listed on the attached service list.

/s/ Mark D. Goldrich

Mark D. Goldrich

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**PETITIONER'S RESPONSE TO RECOMMENDATION OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY**

Pursuant to 35 Ill. Adm. Code 104.220, Petitioner Village of Orland Park ("Village") submits the following response to the Recommendation of Illinois Environmental Protection Agency ("Recommendation") to the Illinois Pollution Control Board ("Board") regarding the Village's Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area Waterway System/Des Plaines River Watershed.

In accordance with the requirements of 35 Ill. Adm. Code 104.216, the Illinois Environmental Protection Agency (Illinois EPA") filed its Recommendation on April 5, 2019. On page 16 of the Recommendation, under the "New Proposed Paragraph 16: Berms", the Village is unclear as to what is meant by "working area". Is the intent to capture runoff from the area used for unloading delivery trucks and loading spreader trucks? Also, under that same section, the Village seeks clarification as to what are the disposal options for the collected effluent.

On page 17 of the Recommendation, under the "Proposed BMP Paragraph 4", the Village seeks clarification if the tarping of trucks refers to salt delivery trucks or salt spreading trucks. Tarping of salt spreading trucks could be problematic due to the small size of the dump body and typical overhead loading methodology. Tarp damage is likely to occur on a regular basis. In addition, the Village would note that logistically, it will be extraordinarily difficult to capture wash water

from cleaning trucks. A separate area would need to be constructed large enough to accommodate several trucks at the same time with all of the effluent being captured and stored in a holding tank. It is not clear how the Village would dispose of the effluent.

Finally, the Village would note that pre-wetting on one-ton plow/spreaders is very difficult without expanding the size of the truck to accommodate the required equipment. Larger trucks create a turning radius that makes it impractical for plowing courts, the typical use.

The Village appreciates the opportunity to respond to Illinois EPA's Recommendation.

Respectfully submitted,

The Village of Orland Park, Illinois

/s/ Dennis G. Walsh

One of Petitioner's Attorneys

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