

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)	PCB 16-14 (Homewood)
ILLINOIS, VILLAGE OF SKOKIE, SKOKIE)	PCB 16-15 (Orland Park)
ILLINOIS, 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)	PCB 16-27 (IDOT)
NEW LENOX, NEW LENOX ILLINOIS, CITY)	PCB 16-29 (MWRDGC)
OF LOCKPORT, LOCKPORT ILLINOIS,)	PCB 16-30 (Richton Park)
CATERPILLAR, INC., CITY OF CREST)	PCB 16-31 (Lincolnwood)
HILL, CREST HILL ILLINOIS, CITY OF)	PCB 16-33 (Oak Forest)
JOLIET, JOLIET ILLINOIS, MORTON SALT,)	PCB 19-7 (Village of Lynwood)
INC., 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, STEPAN CO.,)	PCB 19-11 (Caterpillar)
VILLAGE OF PARK FOREST, PARK)	PCB 19-12 (Crest Hill)
FOREST 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 DOTON,)	PCB 19-18 (Stepan)
DOTON 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, VILLAGE OF)	PCB 19-27 (Morton Grove)
CHANNAHON, CHANNAHON ILLINOIS,)	PCB 19-28 (Lansing)
COOK COUNTY DEPARTMENT OF)	PCB 19-29 (Frankfort)
TRANSPORTATION AND HIGHWAYS,)	PCB 19-30 (Winnetka)
VILLAGE OF NILES, NILES ILLINOIS,)	PCB 19-31 (La Grange)
SKYWAY CONCESSION COMPANY LLC,)	PCB 19-33 (Channahon)
VILLAGE OF ELWOOD, ELWOOD)	PCB 19-34 (CCDTH)
ILLINOIS, CITY OF CHICAGO, CHICAGO)	PCB 19-35 (Niles)
ILLINOIS, VILLAGE OF CRESTWOOD,)	PCB 19-36 (Skyway)
CRESTWOOD ILLINOIS and VILLAGE OF)	PCB 19-37 (Elwood)
RIVERSIDE, RIVERSIDE ILLINOIS)	PCB 19-38 (Chicago)
)	PCB 19-40 (Crestwood)
Petitioners,)	PCB 19-48 (Riverside)
)	
v.)	(Time-Limited Water Quality
)	Standard)
ILLINOIS ENVIRONMENTAL PROTECTION)	(Consolidated)
AGENCY,)	
)	
Respondent.		

PETITIONER VILLAGE OF WINNETKA'S RESPONSE TO
RECOMMENDATION OF THE IEPA

Pursuant to 35 Ill. Adm. Code 104.220, Petitioner Village of Winnetka ("Village") submits the following response to the Recommendation of Illinois Environmental Protection Agency ("IEPA") regarding the Village's Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area

In accordance with the requirements of 35 Ill. Adm. Code 104.216, the IEPA filed its Recommendations on April 5, 2019. The Village provides the following comments on questions concerning the portions of the Recommendation referenced below:

Attachment 1, "TLWQS Conditions"

In condition (a), the Village seeks clarification as to what kind of information will be gathered for re-evaluation and how such information will be gathered.

In condition (c), the Village requests that this condition be defined in more detail concerning the referenced re-evaluation, highest attainable condition, and the nature of the information required.

In condition (d), the Village requests clarification on the frequency and duration of the referenced data collection period.

In condition (f), the Village requests clarification on whether and how costs to prepare the requested annual report are to be allocated among the various Petitioners.

In condition (h), the Village requests that this condition specify that such BMPs are mandatory for any covered discharger if applicable and fiscally possible to implement.

In condition (i), the Village requests clarification as to whether financial limitations are to be considered when evaluating new or innovative technologies.

Attachment 3, "BMP's for MS4s /CSO Communities"

In BMP 7 on page 4, the Village requests that this BMP define the time period for implementation.

In BMP 13 on page 4, the Village requests clarification as to whether the referenced annual report is to be developed by each MS4.

The Village appreciates the opportunity to respond to IEPA's Recommendation,

Respectfully submitted,

VILLAGE OF WINNETKA

By: /s/Andrew N. Fiske

Dated: April 19, 2019
Benjamin L. Schuster
Andrew N. Fiske
Holland & Knight LLP
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

CERTIFICATE OF SERVICE

I, Andrew N. Fiske, an attorney, herein certify that I served a copy of the foregoing NOTICE OF FILING and RESPONSE upon persons listed on the Service List, by sending an email from my email account (andrew.fiske@hklaw.com) 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 April 19, 2019.

/s/ Andrew N. Fiske_____

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ILLINOIS ENVIRONMENTAL PROTECTION)	Standard)
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)	
Respondent.		

NOTICE OF FILING

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

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

Attached Service List

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Pollution Control Board the enclosed Petitioner's Response to Recommendation of the Illinois Environmental Protection Agency on behalf of the Village of Winnetka, a copy of which is herewith served upon you.

VILLAGE OF WINNETKA

Dated: April 19, 2019
Benjamin L. Schuster
Andrew N. Fiske
Holland & Knight LLP
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

By: /s/Andrew N. Fiske