

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

VILLAGE OF WINNETKA, WINNETKA)	PCB 19-23 (Mokena)
ILLINOIS, VILLAGE OF LA GRANGE, LA)	PCB 19-24 (Oak Lawn)
GRANGE ILLINOIS, VILLAGE OF)	PCB 19-25 (Dolton)
CHANNAHON, CHANNAHON ILLINOIS,)	PCB 19-26 (Glenwood)
COOK COUNTY DEPARTMENT OF)	PCB 19-27 (Morton Grove)
TRANSPORTATION AND HIGHWAYS,)	PCB 19-28 (Lansing)
VILLAGE OF NILES, NILES ILLINOIS,)	PCB 19-29 (Frankfort)
SKYWAY CONCESSION COMPANY LLC,)	PCB 19-30 (Winnetka)
VILLAGE OF ELWOOD, ELWOOD ILLINOIS,)	PCB 19-31 (La Grange)
CITY OF CHICAGO, CHICAGO ILLINOIS,)	PCB 19-33 (Channahon)
VILLAGE OF CRESTWOOD, CRESTWOOD)	PCB 19-34 (CCDTH)
ILLINOIS and VILLAGE OF RIVERSIDE,)	PCB 19-35 (Niles)
RIVERSIDE ILLINOIS)	PCB 19-36 (Skyway)
)	PCB 19-37 (Elwood)
Petitioners,)	PCB 19-38 (Chicago)
)	PCB 19-40 (Crestwood)
v.)	PCB 19-48 (Riverside)
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	(Time-Limited Water Quality
AGENCY,)	Standard)
)	(Consolidated)
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 RESPONSE TO MORTON SALTS' COMMENTS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY

Dated: February 13, 2020
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

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ILLINOIS EPA’S RESPONSE TO MORTON SALTS’ COMMENTS

NOW COMES the Illinois Environmental Protection Agency (Illinois EPA or Agency), by and through one of its attorneys, files the following responses to comments by Morton Salt. The Agency states as follows:

- 1) The Agency has again reviewed comments filed by Morton Salt while preparing for the upcoming hearings on the Time Limited Water Quality Standard for chlorides.
- 2) Based on this review, the Agency agrees with Morton Salts’ proposed BMP A.
- 3) The Agency agrees with Morton Salts’ proposed BMP B, except that the Agency would delete,” Where practical”, at the beginning of the sentence.
- 4) The Agency agrees with Morton Salts’ proposed changes to the following in BMP D: 1) delete “policies to prevent or reduce salt runoff” and replace with “practices”; 2) delete

“removing surplus materials from the site when winter activity finished where applicable.”; and 3) replace “unloading and loading” with “loading and unloading”.

5) The Agency agrees with Morton Salts’ BMP F, except for the requirements to submit to the website.

6) The Agency has included an updated proposed Salt Storage Facilities BMPs as Attachment A to these comments.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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

DATED: February 13, 2020

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

Attachment A

Salt Storage Facilities BMPs

- A. All salt will be stored on an impermeable pad constructed to ensure that minimal stormwater comes into contact with salt.
- B. Pads will be constructed to direct stormwater away from the salt pile. The permittee should consider directing any drainage that enters the pad to a collection point where feasible.
- C. Outdoor salt piles not stored under permanent cover must be covered by well-secured tarp at all times except when in active use. While working on the pile, fixed or mobile berms shall be incorporated around non-working face to minimize stormwater contact. The permittee shall stage tarp when starting final lift and tarp over the edge of the berm/pad where possible.
- D. Good housekeeping practices must be implemented at the site, including: cleanup of salt at the end of each day or conclusion of a storm event, tarping of trucks for transportation of bulk chloride; maintaining the pad and equipment; good practices during loading and unloading; cleanup of loading and spreading equipment after each snow/ice event, a written inspection program for storage facility, structures and/or work area; annual inspection and repairs completed when practical; and evaluate the opportunity to reuse the wash water; etc.
- E. Annual training must be conducted for employees responsible for loading/unloading/handling at docks and trucks at the facility.
- F. An annual report must be completed, as required by Chapter 9.2. The report must be standardized in excel, and must be submitted to the IEPA and to the watershed group.
- G. Participate in a Chlorides workgroup for the CAWS or LDPR.
- H. Working areas should be bermed and/or sloped to allow snow melt and stormwater to drain away from the area. In some cases, it may be necessary to channel water to a collection point such as a sump, holding tank or lined basin for collection.
- I. The Permittee shall make use of fixed and mobile berms where appropriate to redirect flow and tarp over the edge of the pad where possible to minimize stormwater contact.
- J. The Permittee should consider the retention of stormwater which contacts the salt from a 25 year/24-hour storm event where feasible. Such retention could be either within the berm, in a separate basin or store the impacted stormwater and use it as pre-wetting brine.

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 COMMENTS TO MORTION SALT, 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 February 13, 2020.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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

DATED: February 13, 2020

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P.O. Box 19276
Springfield, IL 62794-9276
(217) 782-5544

Service List

Dennis Walsh
Klein, Thorpe and Jenkins
10510 S. Ravinia Avenue
Suite 17
Orland Park, IL 60477

David J. Freeman
Robbins, Schwartz, Nicolas, Lifton and Taylor, LTD.
631 E. Boughton Road
Suite 200 Bolingbrook, IL 60440

Christopher J. Cummings
2014 Hickory Road
Suite 205
Homewood, IL 60430

Albert Ettinger
53 West Jackson
Suite 1664
Chicago, IL 60604

Peter Murphy
11800 S. 75th Avenue
Suite 101
Palos Heights, IL 60463

Katherine D. Hodge
Heplerbroom, LLC
4340 Acer Grove Drive
Springfield, IL 62711

Matthew D. Dougherty
IDOT
2300 S. Dirksen Parkway
Springfield, IL 62764

Fredric P. Andes
Barnes and Thornburg
1 N. Wacker Drive
Suite 4400
Chicago, IL 60606

Peter D. Coblenz
Rosenthal, Murphey, Coblenz and Donahue
30 N. LaSalle Street, Suite 1624
Chicago, IL 60602

David Stoneback, Director
Lindsey Ott
City of Evanston
555 Lincoln Street
Evanston, IL 60201

Melanie Pettway
Michael M. Lorge
James G. McCarthy
Village of Skokie
5127 Oakton Street
Skokie, IL 60077

John P. Antonopoulos
Antonopoulos and Virtel, PC
15419 127th Street
Suite 100
Lemont, IL 60439

Hart M. Passman
Holland and Knight LLC
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

Richard Rinchich
Director of Public Works
City of Oak Forest
15440 S. Central Avenue
Oak Forest, IL 60452

Margaret T. Conway
MWRD
100 E. Erie Street
Chicago, IL 60611

Andrew N. Fiske
Steven M. Elrod
Holland and Knight LLC
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

Carl R. Buck
Rathbun, Csevenyak &Kozol, LLC
3620 Executive Drive
Joliet, IL 60431

Peter D. Coblentz
Amber M. Samuelson
Rosenthal, Murphey, Colblentz
& Donahue
30 N. LasSalle Street
Suite 1624
Chicago, IL 60602

Teresa Hoffman Liston
Village of Morton Grove
6101 Capulina Avenue
Morton Grove, IL 60053

George F. Mahoney
822 Infantry Drive
Suite 100
Joliet, IL 60435

Mark E. Burkland
131 S. Dearbron Street
30th Floor
Chicago, IL 60603

Marron Mahoney
822 Infantry Drive
Suite 100
Joliet, IL 60435

Thomas J. Condon Jr.
200 W. Adams
Suite 2125
Chicago, IL 60606

John F. Donahue
30 N. LaSalle Street
Suite 1624
Chicago, IL 60602

Matthew Welch
11950 S. Harlem Avenue
Suite 102
Palos Heights, IL 60463

Benjamin L. Schuster
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

Daniel Siegfried
4340 Acer Grove Drive
Springfield, IL 62711

Jeffrey M. Fronczak
Cook County Department of Transportation
69 W. Washington Street, 24th Floor
Chicago, IL 60602

D. Danielle Grecic
Village of Niles
1000 Civic Center Drive
Niles, IL 60714

Jared Policicchio
Chicago Department of Law
30 N. LaSalle Street
Suite 1400
Chicago, IL 60602

Edward J. Bailey
Village of Riverside
3860 Columbus Boulevard

David J. Silverman
822 Infantry Drive
Suite 100
Joliet, IL 60435

David Sosin
9501 W. 144th Place
Suite 205
Orland Park, IL 60462

Lindsay Britt
915 Hagger Road, Suite 330
Oak Brook, IL 60523

Erin Lavery
20 N. Wacker Drive
Suite 1600
Chicago, IL 60606

Scott Uhler
20 N. Wacker Drive
Suite 1660
Chicago, IL 60606

E. Kenneth Friker
15010 S. Ravinia Avenue
Suite 17
Orland Park, IL 60477

Mario Treto
City of Evanston Law Department
2100 Ridge Road
Evanston, IL 60201

James McCarthy and Michael Lorge
Village of Skokie
5127 Oakton Street
Skokie, IL 60077

Steven Elrod
131 S. Dearborn Street
30th Floor
Chicago, IL 60603

Michael Marovich
10759 W. 159th
Street
Suite 201 Orland Park, 60601

Michael Stiff
1415 Black Road
Joliet, IL 60435

Chuck Anthony
Caterpillar
100 NE Adams St
Peoria, IL 61629

Alexandra Wyss
City of Joliet
150 W. Jefferson
Joliet, IL 60432

Brett Heinrich
222 N. Lasalle Street
Suite 2600
Chicago, IL 60601

Felicia Frazier
3318 W. 95th Street
Evergreen Park, IL 60642

Jeffrey Fort
233 S. Wacker Drive
Suite 7800
Chicago, IL 60606

Sonni Choi Williams, City Attorney
City of Lockport
222 East 9th Street
Lockport, IL 60441

Martin Shanahan
Corporation Counsel
City of Joliet
150 West Jefferson Street
Joliet, IL 60432

Erin Boyd
55 E. Monroe Street
Chicago, IL 60603

David Rieser
70 W. Madison
Suite 3100
Chicago, IL 60602

David Mehlman
222 N. LaSalle Street
Suite 2600
Chicago, IL 60601

Richard Porter
100 park Avenue, PO Box 1389
Rockford, IL 61105