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

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

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
Via Electronic Mail

Brad Halloran, Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601
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 IEPA'S POST HEARING COMMENTS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

Dated: April 21, 2020
1021 North Grand Avenue East
PO Box 19276
Springfield, Illinois 62794

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

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ILLINOIS EPA'S POST HEARING COMMENTS

NOW COMES the Illinois Environmental Protection Agency (Illinois EPA or Agency), by and through one if its attorneys, and submits the following responses with respect to the November 14, 2019 Order.

1. This proceeding involves approximately 49 Petitioners who are seeking a watershed time-limited water quality standard (TLWQS) for chlorides from the Illinois Pollution Control Board (Board). Initially, in 2015, sixteen Petitioners had individually sought a variance from the recently adopted chloride water quality standard. The Board consolidated these petitions, and they were converted to TLWQS petitions by operation of law in February 2017.

2. Shortly thereafter, the Board established the following classes of dischargers that may be covered by the TLWQS: publicly owned treatment works (POTWs), communities with combined sewer overflow (CSO) outfalls, industrial sources; municipal separate storm sewer

systems (MS4s); Illinois Department of Transportation (IDOT) and Illinois Tollway discharges, and salt storage facilities. Village of Homewood, PCB 16-14 (cons.) slip op. at 2 (April 12, 2017). The class of dischargers includes those that discharge into the Des Plaines River watershed from the Kankakee River to the Will County Line (except for the DuPage River watershed) and the Chicago Area Waterways System watershed (except the North Branch Chicago River watershed upstream of the North Shore Channel and those portions of the watershed located in Indiana). Homewood, PCB 16-14 (cons.) slip op. at 2 (June 8, 2017).

3. The Board determined that the previously filed petitions for a variance were not in substantial compliance with the requirements for TLWQS. Homewood, PCB 16-14 (cons.) slip op. at 3 (June 8, 2017). The Board granted those 16 Petitioners and any other member of the discharger classes until July 26, 2018, to file an amended petition. *Id.* Approximately thirty-three other Petitioners have joined in seeking a watershed TLWQS.

4. The amended petition in this TLWQS proceeding, filed on July 24, 2018, consists of two components: the Joint Submittal in Support of Petition for Chloride Time Limited Water Quality Standard for the Defined Chicago Area Water System/Des Plaines River Watershed (Joint Petition), and individual submittals for all 49 petitioners that include discharger specific information.

5. On December 20, 2018, the Board found the Joint Petition to be in substantial compliance. *See* PCB 16-14 at 5, December 20, 2018.

6. The Petitioners are seeking a watershed TLWQS from the Board's chloride water quality standard in 35 Ill. Adm. Code 302.407(g)(3) within the Lower Des Plaines River (LDPR) watershed and portions of the Chicago Area Waterway System (CAWS) watershed. The Board established the chlorides water quality standard at issue here pursuant Section 303 of the federal

Clean Water Act (CWA), 33 USC §1251(a)(2), which requires states to adopt water quality standards that include designated uses and the criteria to protect such uses. 40 CFR §131.2 (2018). The water quality criteria "represents the conditions (e.g. concentrations of particular chemicals, levels of certain parameters) sufficient to restore and maintain the chemical, physical, and biological integrity of the water bodies and protect applicable designated uses." Water Quality Standards Handbook: Second Edition, Chapter 3: Water Quality Criteria, p.1 (EPA-823-B-17-001). The chlorides water quality standard at issue in this petition is 500 mg/l. J. Sub. at 1.3; *See* 35 Ill. Adm. Code 302.407(g)(3).

7. The CWA, and regulations adopted thereunder by United States Environmental Protection Agency (USEPA), allow for variances from a water quality standard for a limited period of time. *See* 40 CFR 131.14. A water quality standards variance is defined as a "time-limited designated use and criterion for a specific pollutant(s) or water quality parameter(s) that reflect the highest attainable condition during the term of the WQS variance." In Illinois, water quality standard variances are called TLWQS. 415 ILCS 5/3.488. USEPA will approve a water quality standard variance if a state can prove, among other things, that attaining the designated use and criterion are not feasible throughout the term of the water quality standard variance because of one of the factors listed in 40 C.F.R. 131.13(10)(g) (10(g) factors). 40 C.F.R.131.14(b)(2)(i)(A)(2)

8. In this case, the Petitioners ask for a TLWQS for chlorides for a 15-year time period, with a 5-year re-evaluation cycle. J. Sub. at 10.1. They claim the 500 mg/l chlorides water quality standard is not feasible because of two of the 10(g) factors:

> Factor 3: Human cause conditions or sources of pollution prevent the attainment of the designated use and cannot be remedied or would cause more environmental damage to correct than to leave in place.

Factor 6: Widespread economic and social impact would result from controls more stringent than those required by the CWA Section 301(b) and 306.

J. Sub. at 3.1; See 35 Ill. Adm. Code 104.560(a)(3), (6); 40 C.F.R. 131.10(g)(3) and (6). During the term of the TLWQS, the Petitioners proposes the highest attainable condition as an interim criterion of a range of values between 269 and 280 mg/l or, alternatively, a single value of 275 mg/l. J. Sub Ch. At 8.2. To achieve the highest attainable condition, the Petitioner propose numerous BMPs for each class of discharger. J. Sub. at 2.8-2.19. Petitioners propose that compliance with the highest attainable condition be evaluated at the end of the first 5-year period of the TLWQS, and calculated as the average of the chloride measurements during the winter months over that 5- year period at downstream locations representative of the CAWS watershed (Chicago Sanitary and Ship Canal at Lockport) and LDPR (Chanahan). J. Sub. at 10.1-10.2.

9. The Agency filed its recommendation with the Board on April 5, 2019.

10. The Agency supports the TLWQS filed by the Petitioners, but encourages the Board to adopt the language suggested by the Agency found in Attachment 1 to these comments. (See Attachment 1)

11. The Agency further explained its position with respect to the TLWQS and the Agency's proposed conditions when the Agency filed responses to the Board's questions on September 23, 2019.

12. The Agency was asked at the February hearing if the Agency has the authority to require outreach and education. The Agency could not find anything suggesting the Agency does or does not have the authority. However, the Agency believes, as well as USEPA, that these are essential components needed for a successful watershed TLWQS. There is a need in a watershed TLWQS for collaboration amongst the workgroup as well as reaching out to public and

surrounding communities. See Also USEPA's Comments of March 16, 2020. As an example, the DuPage River Salt Creek Workgroup (DRSCW) has a webpage with information for Chloride and Winter Management (www:\\drscw.org) with information on chloride reductions and links to other sites to be used as a reference.

13. The Agency was asked at the January hearing as to what impact the TLWQS would have on CITGO's permit. The Agency attends to remove requirements currently in CITGO's permit and replace with the requirements that will be adopted under the TLWQS.

14. As in the response to questions, the agency cannot commit to a 120-day time limit to issue an NPDES permit because there are too many variables (issues related to the permit, public hearing requests, public comments, etc.). The Agency proposes that within 120 days, the Agency will notify the permittee know the Agency's intention to be covered by the TLWQS. As such, the language suggested by the Agency found in Attachment 1 to these comments. (See Attachment 1).

15. The Agency was asked at the hearing how the public would be able to comment on pollution minimization plans (PMPs). It is the Agency's thoughts that once a permitee's permit came up for renewal or a modification the PMPs and BMPS would then be written into the permit and at that time the public would be able to comment on those during the permitting process. Also, after looking at the issue of PMPs, the Agency would like to add that PMPs should be submitted to the Agency. This proposed language can be found in Table 4 of the Attachment A.

16. The Agency was asked at the hearing if the public bring an enforcement action if the plans were not followed by Petitioners. The Agency believe one could bring an enforcement action if the adopted TLWQS is not followed as adopted by the Board.

17. The changes suggested by the Agency in E, should not made to Sections F and G.

18. The Agency was asked if the TLWQS would provide relief if a more stringent standard was adopted. The Agency posed this question to USEPA and it the Agency's understanding there would be no change, but adjustments would need to be made to the TLWQS at the end of the fifteen years.

19. The Agency believes the Board should adopt the proposed chlorides TLWQS with the language as proposed by the Agency. See Attachment 1.

WHEREFORE, the Agency respectfully requests the Board to proceed to First Notice with the language as proposed by the Agency in Attachment 1.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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

Date: April 21, 2020

Illinois Environmental Protection Agency
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IEPA'S ATTACHMENT 1

IEPA'S PROPOSED LANGUAGE
Time-Limited Water Quality Standard for Chloride

In lieu of the applicable water quality standards for chloride under 35 Ill. Adm. Code 302~~and total dissolved solids~~ for the waterways listed in Table 1 for the dischargers listed in Table 2 and the watershed depicted in Figure 1; the Board grants a Time Limited Water Quality Standard (TLWQS) for chloride subject to the following conditions.

Additional dischargers not listed in Table 2, wishing to be considered eligible under this TLWQS for chloride, must meet the Eligibility Criteria listed below and receive approval from IEPA.

1. **Eligibility Criteria**

   a) A discharger must be located in the Chicago Area Waterway System (CAWS) or Lower Des Plaines River (LDPR) watersheds as identified by the Board pursuant to Section 104.565(d)(2)(A)(i).

   b) The discharger must belong to one of the classes identified by the Board pursuant to 35 Ill. Adm Code 104.540.

   c) The discharger, if a new source of chloride, must offset at least their additional loading before receiving coverage under the TLWQS.

   d) The discharger must have joined and will be participating in either the CAWS chlorides workgroup or the LDPR chlorides workgroup.

   e) The discharger is committed to implementing a pollutant minimization program which includes all the Best Management Practices (BMP) identified by the Board's order granting the TLWQS.

   f) The discharger is committed to implementing any required BMP not currently being implemented within 12 months.

   g) The discharger must commit to participating in the re-evaluation proposal pursuant 35 Ill. Adm. Code Section 104.580.

   h) The discharger must submit the following information to the Illinois EPA:

      1) the location of the discharger's activity and the location of the points of its discharge;

      2) identification of discharger's NPDES permits;

3) identification and description of any process, activity, or source that contributes to a violation of the chlorides water quality standard, including the material used in that process or activity;

4) a description and copy of all Pollutant Minimization Plans that are currently being implemented or were implemented in the past; and

5) identification of any other BMPs being implemented to reduce chloride in the discharge that are not identified by the Board's order granting the TLWQS.

i) Within ~~90~~ 120 days, IEPA must notify the discharger ~~whether it is approved~~ of IEPA's intention for the discharger to be covered under this TLWQS.

2. **Best Management Practices**

a) The dischargers covered by this TLWQS must implement the Best Management Practices identified in Table 3 according to the Implementation Schedule in Table 4.

3. **Individual Dischargers Covered by this TLWQS**

a) By the deadline listed in Table 4, dischargers must each prepare a Pollutant Minimization Program for their own operations that identifies the specific BMPs in Table 3 that it will implement along with the applicable monitoring, recordkeeping and reporting procedures, and the relevant schedule for implementation as provided in Table 4.

b) By the deadlines listed in Table 4, dischargers must submit an Annual Report to IEPA and the appropriate chlorides workgroup on the discharger's prior year's usage of deicing agents and steps taken to minimize chloride use. Dischargers must make the report publicly available and include the following:

BMPs

1) List of the BMPs being used and to what extent

2) Analysis of BMPs that the discharger has implemented over the term of the TLWQS, including a discussion of the effectiveness and environmental impact of the BMPs, and any hinderances or any unexpected achievements or setbacks

3) Analysis of any alternative treatments or new technology that could be implemented by the discharger to reduce chloride loadings to the waterways

Deicing Agents Used

4) Types of deicing agents used and whether they are used as dry, pre-wetted, or liquid (e.g., sodium chloride rock salt, calcium chloride, magnesium chloride, calcium magnesium acetate, potassium acetate, potassium chloride, abrasives, urea, organics)

5) Estimate of the amount of chloride salt usage ~~on~~ in the past year and over the term of the TLWQS

6) Estimates of relative amounts applied and relative percent coverage achieved by the following types of deicing agents: dry, wet, liquid

7) Application practices used (cleared using pre-wetted salt; cleared using anti-icing)

8) Application rates (pounds/lane mile, ~~or~~ gallons/lane mile, lbs/square foot, gallons/square foot) by deicing agent type and storm event (e.g. 1-inch storm event; long duration freezing rain event)

9) Description of how application rates varied for different types of weather and how they have changed over the term of the TLWQS.

10) Whether the use of liquids was increased, and dry chloride salt application rates were reduced

11) Callouts

    a) Summary of snowfall data

    b) Number of callouts

    c) Quantity and type of precipitation during the callout

    d) Application rate for each type of deicing agent during the callout

    e) Quantity of chloride salt used for each callout

Training

12) Annual training that was completed for the entire workforce that applied chloride-based deicing salts

13) Identification of additional training that is necessary

14) Explanation of why discharger was unable to complete the training identified in the previous annual report

Deicing and Snow Removal Equipment

15) Types and numbers of snow and/or ice removal equipment used (e.g., snowplows as well as mechanically controlled spreaders and computer-/sensor-controlled spreaders for dry solids, pre-wetted solids, or liquids)

16) Description of equipment washing as well as wash water collection and disposal or reuse for making brine

Salt Storage

17) Number of chloride salt storage areas

18) Number of chloride salt storage areas in fully enclosed structures

19) Number of chloride salt storage areas on an impervious pad

20) Number of chloride salt storage areas without a fully enclosed storage structure or impervious storage pad

21) Information on salt storage methods used to ensure good housekeeping policies are implemented (e.g., cleaned-up salt piles)

Purchases

22) Identification of necessary capital purchases and expenditures over the next three years to reduce de-icing chloride salt applications, focused on increased use of liquids and reducing chloride salt application rates as well as cleaning up salt piles. (e.g., new storage structures; new or retrofitted salt spreading equipment necessary to allow for pre-wetting and proper rates of application)

23) Explanation of why discharger was unable to make all capital purchases and expenditures identified in the previous annual report.

Environmental Monitoring Data

24) Any changes to a facility's NPDES treatment technologies

25) NPDES effluent data, if any, for chloride discharges

26) Summary of relevant, available instream chloride monitoring data for local waterway (which may reference data gathered by State or Federal agencies or other parties)

Projections

27) Proposed steps for the coming year

28) Description of how the dischargers will implement an adaptive, iterative management approach based on reviewing annual reports to adjust salt application practices to achieve further chloride reductions in the coming year

4. **Chloride Workgroups**

a) The dischargers covered by this TLWQS must participate in a chloride workgroup whose main goals are working toward the reduction of chloride in the receiving stream and gathering information for the reevaluation.

b) The dischargers must participate in the workgroup(s) associated with the watershed in which the discharge is located.

c) Workgroups must convene at least semi-annually and continue meeting throughout the term of the TLWQS.

d) By the deadlines listed in Table 4, the workgroup must submit a Status Report to IEPA and make the report publicly available. The Status Report must compile and analyze the individual discharger Annual Reports into a watershed-wide report and include the following:

1) Chlorides monitoring data

2) Workgroup's outreach strategy, including efforts to include other dischargers under the TLWQS, and outreach and training for nonpoint sources

3) New BMPs and treatment technologies to reduce chloride loading to the environment

4) Impediments faced by dischargers under the TLWQS that prevent them from completing the training and making all capital purchases necessary to implement the required BMPs

5) Possible solutions to impediments listed in (4)(d)(4)

6) Identification and description of any financial, technical, or other assistance the workgroup may be able to provide individual dischargers to overcome the impediments described in (4)(d)(4)

7) Results of criteria measurement and compliance demonstration with the highest attainable condition under Item 5

e) Workgroups must prepare outreach and educational materials to create awareness about the environmental impacts of chlorides. Workgroups must share these materials with other users of road salt in their local area~~, including residents, road salt applicators, elected officials, and businesses~~. Outreach and education materials may include various forms of social media, incentives for chloride reduction, support for community-based training of commercial road salt spreaders, training for residents and other entities that apply road salt, and funding or other support to implement chloride BMPs in communities where new equipment is not affordable.

f) Workgroups must coordinate with IEPA to identify communities located in the TLWQS watersheds who have Municipal Separate Storm Sewer System (MS4) permits. Workgroups must reach out to the MS4 communities to remind them of the general permit special condition requiring participation in a watershed chloride workgroup and provide information on participating in their workgroup. Additionally, workgroups must provide MS4 communities with their education materials.

g) Workgroups must coordinate with IEPA to identify different nonpoint source categories beginning in year seven of the TLWQS term. Workgroups must work with IEPA to prioritize and implement education outreach efforts for nonpoint sources based on their road salting practices and proximity to surface waters.

(h) Workgroups must identify all sampling points and sampling frequency in a sampling plan to demonstrate compliance with the highest attainable condition as delineated in Item 5.

5. **Criteria Measurement and Compliance Demonstration**

a) ~~The interim summer criterion for the months of May through November is 500 mg/L.~~

~~b)~~ The interim winter criterion for the months of December through April is 280 mg/L. Compliance is to be assessed as an average of the measurements during the months of December through April at the end of the first five-year term, using a 4-year seasonal average for the first re-evaluation period, and then every five years thereafter.

~~b~~c) Measurements for the interim ~~summer and~~ winter criterion for CAWS must be based on instream water quality sampling at Lockport Forebay on the CSSC (RM 290.9) upstream of the confluence with the Des Plaines River.

~~c~~d) Measurements for the interim ~~summer and~~ winter criteriona ~~for~~ LDPR must be based on instream water quality monitoring~~sampling~~ at the USGS gage 05539670 ~~at the Des Plaines River at Oil Tanking (Site LPRCW_03) at River Mile 275.8~~ in Channahon, IL.

~~e) Measurements for the interim summer and winter criteria for General Use Waters must be based on instream water quality sampling or modeling at the edge of the permitted mixing zone.~~

~~f) Measurements for the interim summer and winter criteria for CSSC must be based on instream water quality sampling in the CSSC near the confluence of the CSSC with LDPR.~~

6. **Re-evaluation**

a) By the deadlines listed in Table 4, dischargers under this TLWQS or the chloride workgroups must submit a proposed re-evaluation under 35 Ill. Adm. Code 104.580, which assesses the highest attainable condition using all existing and readily available information.

b) To ensure that there is enough data collected to perform the re-evaluation, the chloride workgroups must conduct sufficient data collection in the receiving stream~~that was used in the support of this chloride TLWQS must continue~~.

c) Chloride workgroups must evaluate if the chloride sampling plan and data collection needs to be expanded or otherwise modified.

d) At each re-evaluation, dischargers covered under this TLWQS or the chloride workgroups must ~~shall~~ evaluate each required BMP, analyze its effectiveness, and provide a recommendation about whether it should be continued as is, modified to improve its effectiveness, or eliminated. The dischargers covered under this TLWQS or the chloride workgroups must ~~shall~~ consider any new or innovative technology that could improve water quality if implemented and identify all such technologies.

7. **Time-Limited Water Quality Standard Term**

a) The term of the TLWQS expires 15 years after USEPA approval.

b) During the 15-year term, a re-evaluation of the Highest Attainable Condition must be submitted to the Board and subsequently to USEPA six months before the end of each five-year TLWQS period. The discharges in Table 2 must participate in the workgroup that conducts and submits this re-evaluation.

c) If the ~~280 mg/L interim criterion~~ chloride water quality standard is not attained at the end of the first five years, then the dischargers covered by this TLWQS must evaluate the feasibility of implementing additional measures beyond those identified in Tables 3 and 4 to reduce ambient chloride levels in the ~~W~~watershed.

The Agency is directed to modify or issue NPDES Permits for each discharger covered by this TLWQS that incorporate the conditions of this TLWQS, the Best Management Practices in Table 3, and the implementation schedule in Table 4.

Table 1: Receiving Waters, Use Designations and Generally Applicable Water Quality Standards for Chloride ~~and Total Dissolved Solids~~

RECEIVING WATER		USE DESIGNATION	HUC Code	IEPA SEGMENT CODE	Generally Applicable Chloride Water Quality Standard
Chicago Area Waterway System	**CAWS**				
Upper Northshore Channel from Wilmette Pumping Station to North Side WRP	Upper NSC	CAWS Aquatic Life Use A	071200030104	HCCA-02	302.208(g) 500 mg/L Chloride Year Round
Lower NSC from North Side WRP to confluence with NBCR	Lower NSC	CAWS Aquatic Life Use A	071200030104	HCCA-04	~~302.208(g)~~ 302.407(g)(3) 500 mg/L Chloride Year Round
North Branch of the Chicago River	NBCR	CAWS Aquatic Life Use A	071200030106	HCC-02 HCC-08	302.407(g)(3) 500 mg/L Chloride Year Round
Chicago River (from Lake Michigan to confluence with NBCR and SBCR)	CR: Lake Michigan-NBCR & SBCR	General Use	071200030107	HCB-01	302.208(g) 500 mg/L Chloride Year Round
South Branch of the Chicago River	SBCR	CAWS Aquatic Life Use A	071200030107	HC-01	302.407(g)(3) 500 mg/L Chloride Year Round
Chicago Sanitary and Ship Canal	CSSC	CAWS and Brandon Pool Aquatic Life Use B	071200030107 071200040705	GI-03 GI-06 GI-02	303.449 May-Nov. 500 mg/L Chloride Dec.-Apr.

RECEIVING WATER		USE DESIGNATION	HUC Code	IEPA SEGMENT CODE	Generally Applicable Chloride Water Quality Standard
					Acute 990 mg/L Chronic 620 mg/L
Cal-Sag Channel	CSC	CAWS Aquatic Life Use A	071200030403 071200040702	H-02 H-01	302.407(g)(3) 500 mg/L Chloride Year Round
Grand Calumet River	GCR	CAWS Aquatic Life Use A	071200030407	HAB-41	302.407(g)(3) 500 mg/L Chloride Year Round
Lake Calumet	LC	CAWS Aquatic Life Use A	040400010603	IL_RHO	302.407(g)(3) 500 mg/L Chloride Year Round
Lake Calumet Connecting Channel	LCCC	CAWS Aquatic Life Use A	040400010603	NA	302.407(g)(3) 500 mg/L Chloride Year Round
Calumet River from Lake Michigan to its confluence with GCR and LCR	CR	CAWS Aquatic Life Use A	040400010603	HAA-01	302.407(g)(3) 500 mg/L Chloride Year Round
Little Calumet River from its confluence with CR and GCR to its confluence with CSC	LCR	CAWS Aquatic Life Use A	071200030407	HA-05 HA-04	302.407(g)(3) 500 mg/L Chloride Year Round
Lower Des Plaines River	**LDPR**				
Des Plaines River from Kankakee River to the I-55 Bridge	DPR: KR-I-55 Bridge	General Use	071200040705	IL_G-03 IL_G-11	302.208(g) 500 mg/L Chloride Year Round

RECEIVING WATER		**USE DESIGNATION**	**HUC Code**	**IEPA SEGMENT CODE**	**Generally Applicable Chloride Water Quality Standard**
Des Plaines River from the I-55 Bridge to Brandon Road Lock and Dam	DPR: I-55 Bridge – BRLD	Upper Dresden Island Pool Aquatic Life Use	071200040705	IL_G-11	302.407(g)(3) 500 mg/L Chloride Year Round
Des Plaines River from the Brandon Road Lock and Dam to confluence with CSSC	DPR: BRLD – CSSC	CAWS and Brandon Pool Aquatic Life Use B	071200040705	IL_G-12 IL_G-23	302.407(g)(3) 500 mg/L Chloride Year Round
Des Plaines River from confluence with the CSSC to the Will County Line	DPR: CSSC-Will County Line	General Use	071200040705 071200040706	IL_G-24 IL_G-39	302.208(g) 500 mg/L Chloride Year Round
Hickory Creek	HC	General Use	071200040601 071200040603	IL_G-04 IL_G-06 IL_G-22	302.208(g) 500 mg/L Chloride Year Round
Union Ditch	UD	General Use	071200040601	IL_GG-FN-A1 IL_GG-FN-C1	302.208(g) 500 mg/L Chloride Year Round
Spring Creek	SC	General Use	071200040602	IL_GGA-02	302.208(g) 500 mg/L Chloride Year Round
Marley Creek	MC	General Use	071200040603	IL_GGB-01	302.208(g) 500 mg/L Chloride Year Round
East Branch of Marley Creek	EBMC	General Use	071200040603	NA	302.208(g) 500 mg/L Chloride Year Round

Table 2: Individual Dischargers and Receiving Waters

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
16-14	**Village of Homewood**	2020 Chestnut Re., Homewood, IL 60430	CalR & LCR	ILR400357 – Cook County	MS4
16-15	**Village of Orland Park**	Orland Park, Cook and Will Counties, IL	CSC HC SC MC	ILR400414	MS4
16-16	**Village of Midlothian**	14801 S. Pulaski, Midlothian, IL 60445	CSC	ILR400387	MS4
16-17	**Village of Tinley Park**	16250 S. Oak Park Ave., Tinley Park, IL 60477	CalR & LCR	ILR400460	MS4
16-18	**ExxonMobil Joliet Refinery, ExxonMobil Oil Corp.**	25915 South Frontage Rd, Channahon, IL 60410	DR-KR	IL0002861 ILR10	IS
16-20	**Village of Wilmette**	711 Laramie Ave., Wilmette, IL 60091	NBCR NSC	MS4 ILR40-0473 CSO ILM580012	MS4 CSO
16-21	**City of Country Club Hills**	4200 West 183rd St., Country Club Hills, IL	CalR & LCR	ILR400177	MS4
16-22	**Noramco-Chicago, Inc.**	12228 New Ave., Lemont, IL 60439	CSSC	NA (Pending permit application: IL0001309)	SSF

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
16-23	**INEOS Joliet, LLC**	23425 Amoco Road, Channahon, IL 60410	DPR: KR-WC	IL 0001643	IS
16-25	**City of Evanston**	2100 Ridge Ave., Evanston, IL 60201	NSC	ILM580036 (CSO) ILR400335 (MS4)	MS4 CSO
16-26	**Village of Skokie**	5127 Oakton St., Skokie, IL	NSC	ILM580036 (CSO) ILR400447 (MS4)	MS4 CSO
16-27	**IDOT**	2300 S. Dirksen Pkwy, Springfield, IL	**CAWS** CR NBCR SBCR CSSC CSG GCR LC LCCC CalR & LCR NSC **LDPR** DPR: KR-WC HC UD SC MC EBMC	ILR00493	IDOT/IT

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
16-29	**Calumet WRP, MWRDGC**	400 E. 130th St., Chicago, IL 60628	CSC CalR & LCR	IL0028061 ILR003177	POTW
	Lemont WRP, MWRDGC	13 Stephen St., Lemont, IL	CSSC	IL0028070	POTW
	Lockport Powerhouse, MWRDGC	2400 South Powerhouse Rd., Lockport, IL 60441	CSSC	IL0077305	IS
	Stickney WRP, MWRDGC	6001 W. Pershing Rd., Cicero, IL 60804-4112	SBCR CSSC	IL0028053 ILR003183	POTW
	Terrence J. O'Brien (North Side) WRP, MWRDGC	3500 W. Howard St., Skokie, IL 60076	NBCR NSC	IL0028088	POTW
16-30	**Village of Richton Park**	4455 Sauk Trail, Richton Park, IL 46071	CalR & LCR	IL3012550 ILR40 (MS4)	MS4 SSF
16-31	**Village of Lincolnwood**	6900 N. Lincoln Ave., Lincolnwood, IL 60712	NSC	ILR400218 ILM580034	MS4 CSO
16-33	**City of Oak Forest**	15440 S. Central Ave., Oak Forest, IL 60452	CSC CalR & LCR	ILR400408	MS4
19-7	**Village of Lynwood**	21460 E Lincoln Hwy, Lynwood, IL 60411	CalR & LCR	ILR40-0380	MS4 SSF
19-8	**CITGO Petroleum Corp. – Lemont Refinery**	135th Street and New Avenue, Lemont, IL 60439	CSSC	IL0001859	IS
19-9	**Village of New Lenox – STP #1, STP #2, STP #3**	1 Veterans Pkwy, New Lenox, IL 60451	DR-KR HC SC	IL0020559 IL0046264 IL0075957	POTW MS4

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
				ILR400397	
19-10	**Lockport Sewage Treatment Plant**	425 W. Division St., Lockport, IL 60441	DPR: KR-WC	IL0029611 (Lockport) IL0021261 (BBFM) ILR40 (MS4)	POTW MS4
19-11	**Caterpillar, Inc.**	2200 Channahon Rd., Joliet, IL 60434	DPR: KR-WC	IL0001732	IS
19-12	**Crest Hill East Sewage Treatment Plant,** **Crest Hill MS4**	1610 Plainfield Rd., Crest Hill, IL 60403	DPR: KR-WC	IL0064998 (NPDES) ILR40 (MS4)	POTW MS4
19-13	**City of Joliet**	150 W. Jefferson St., Joliet, IL 60432	DPR: KR-WC HC SC	IL0022519 (NPDES) IL0033553 (NPDES) ILR10 (MS4)	POTW CSO MS4 SSF
19-14	**Morton Salt, Inc.-Chicago, IL-Calumet site**	3443-3461 East 100th Street, Chicago, IL 60617	CalR & LCR	ILR00 (General Permit)	SSF
19-15	**City of Palos Heights Public Works**	7607 West College Dr., Palos Heights, IL 60463	CSC	ILR400417 (MS4)	MS4 SSF
19-16	**Village of Romeoville**	615 Anderson Dr, Romeoville, IL	DPR: KR-	ILL048526	POTW

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
			WC	ILR400436	MS4
19-17	**IMTT Illinois LLC, Joliet Facility**	24420 W Durkee Road, Joliet, IL 60410	DPR: KR-WC	IL0063061	IS
		13589 Main St., Lemont, IL 60439	CSSC	IL0005126 IL0061182	
19-18	**Stepan Millsdale, Stepan Company**	2250 Stepan Drive, Elwood, IL 60421	DPR: KR-WC	IL0002453	IS
19-19	**Village of Park Forest Storm Sewer System**	350 Victory Drive, Park Forest, IL	CalR & LCR	ILR400421 (MS4)	MS4
19-20	**Ozinga Ready Mix Concrete, Inc.**	2525 Oakton St., Evanston, IL 60202 1818 East 103rd St., Chicago, IL 60617 12660 Laramie Ave., Alsip, IL 60803 11400 Old Lemont Rd., Lemont, IL 60439 2255 South Lumber St., Chicago, IL 60616 18825 Old La Grange Rd., Mokena, IL 60448 2001 North Mendell St., Chicago, IL 60642 504 Railroad St., Joliet, IL 60436	NSC CalR & LCR CSC CSSC SBCR HC NBCR DPR: KR-WC	ILR004480 ILR003588 ILR006916 ILR005770 ILR003584 ILR003587 ILR005319 ILR005865	IS IS IS IS IS IS IS IS
19-21	**Ozinga Materials, Inc.**	13100 South Ashland Ave., Calumet Park, IL 60827	CSC CalR & LCR	Permit Pending	IS

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
19-22	**Midwest Marine Terminals, LLC**	11701 South Torrence Ave., Chicago, IL 60617	CalR & LCR	ILR006553	IS
19-23	**Village of Mokena**	WTP: 11400 W. 191st St., Mokena, IL 60448 MS4: 11004 Carpenter St., Mokena, IL 60448	EBMC HC EBMC	IL0024201 ILR40	POTW MS4
19-24	**Village of Oak Lawn, Public Works**	5550 and 5532 West 98th St., Oak Lawn, IL	CSC	ILR400409 ILR400712	MS4 SSF
19-25	**Village of Dolton**	14122 Chicago Rd., Dolton, IL 60419	CalR & LCR	ILR400182 (MS4) ILM580017 (CSO)	CSO
19-26	**Glenwood Public Works Department, Village of Glenwood**	19100 Glenwood/Chicago Heights Rd., Glenwood, IL	CalR & LCR	ILR400344	MS4 SSF
19-27	**Village of Morton Grove, Public Works**	7840 Nagle Ave., Morton Grove, IL	NBCR	ILR400391 (MS4) ILM580005 (CSO)	CSO MS4 SSF
19-28	**Village of Lansing**	3141 Ridge Road, Lansing, IL 60438	CalR & LCR	ILR400373 ILM580027	CSO MS4
19-29	**Village of Frankfort Regional WWTP**	20538 South La Grange Rd., Frankfort, IL	HC	IL0072192	POTW
19-30	**Village of Winnetka**	1390 Willow Road, Winnetka, IL 60093	NBCR	ILR400476	MS4

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
19-31	**Village of La Grange**	320 East Avenue, La Grange, IL 60525	CSSC	ILM580009 (CSO) ILR400364 (MS4)	CSO MS4 SSF
19-33	**Village of Channahon STP**	26221 S. Blackberry Lane, Channahon, IL 60410	DPR: KR-WC	IL0069906	POTW
	Village of Channahon, MS4	Various	DPR: KR-WC	IL400623	MS4
19-34	**Cook County Department of Transportation and Highways**	Cook County	**CAWS:** NBCR CSSC CSC CalR & LCR NSC **LDPR:** HC UD SC MC EBMC	ILR400485	MS4
19-35	**Village of Niles**	6849 West Touhy Ave., Niles, IL 60714	NBCR	ILR400398	CSO MS4 SSF
19-36	**Chicago Skyway Toll Bridge,** **Skyway Concession Company, LLC**		CalR & LCR	ILR400739 (MS4)	MS4
19-37	**Village of Elwood – Deer Run STP**	26550 Elwood International Port Road, Elwood, IL 60421	DPR: KR-WC	IL0074713	POTW

PCB	PERMIT HOLDER	FACILITY LOCATION	RECEIVING WATER	PERMIT NUMBER	DISCHARGER CATEGORY
19-38	**City of Chicago, Department of Water Management**	1000 East Ohio Street, Chicago, IL 60611	CR NBCR SBCR CSSC LCCC CalR & LCR	ILR400173	MS4
		1000 East Ohio Street, Chicago, IL 60611	CR NBCR SBCR CSSC CSC CalR & LCR NSC	IL0045012	CSO
19-40	**Village of Crestwood**	13840 S. Cicero Ave., Crestwood, IL	CSC	ILR400320	MS4
19-48	**Village of Riverside, Salt Storage Facility**	3860 Columbus Blvd., Riverside, IL 60546	CSSC	ILM580015	SSF
	Village of Riverside, CSOs	3860 Columbus Blvd., Riverside, IL 60546	CSSC	ILM580015	CSO
	Village of Lemont*				
	Village of Burr Ridge*				
	Village of Woodridge*				

* Per IEPA Rec. Att. 2., these non-petitioners may seek coverage under the TLWQS.

TABLE KEY

Discharger Category

POTW	Publicly Owned Treatment Works
IS	Industrial Source
IDOT/IT	Illinois Department of Transportation/Illinois Tollway
SSF	Salt Storage Facility
CSO	Community with Combined Sewer Overflow Outfalls

MS4	Municipal Separate Storm Sewer System

Discharge Locations / Receiving Waters

CAWS	**Chicago Area Waterway System**
CR	Chicago River
NBCR	North Branch of the Chicago River
SBCR	South Branch of the Chicago River
CSSC	Chicago Sanitary and Ship Canal
CSC	Cal-Sag Channel
GCR	Grand Calumet River
LC	Lake Calumet
LCCC	Lake Calumet Connecting Channel
CalR & LCR	Calumet River and Little Calumet River
NSC	North Shore Channel

LDPR Lower Des Plaines River

DPR:	Des Plaines River
KR	Kankakee River
WC	Will County Line
HC	Hickory Creek
UD	Union Ditch
SC	Spring Creek
MC	Marley Creek
EBMC	East Branch of Marley Creek

Table 3: Best Management Practices

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
Permittees and parties covered under the Time Limited Water Quality Standard for Chloride (PCB 16-14 (Consolidated)) must implement the following Best Management Practices as applicable and indicated below for each discharger type:							
1.	The Permittee must ~~P~~ participate in a Chlorides workgroup for the CAWS ~~and~~ or LDPR, depending on the watershed within which the facility's discharge is located.	☐	☐	☐	☐	☐	
2.	Store all salt on an impermeable pad that must be constructed to ensure that minimal stormwater is coming into contact with salt unless the salt is stored in a container that ensures stormwater does not come into contact with the salt.	☐	☐	☐	☐	☐	
3.	Cover salt piles at all times except when in active use, unless stored indoors.	☐	☐	☐	☐	☐	
4.	~~At salt piles and during salt loading/unloading operations, implement g~~ Good housekeeping ~~policies to prevent or reduce salt runoff,~~ 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 ~~and loading~~;~~,~~ cleanup of loading and spreading equipment after each snow/ice event, a written inspection program for storage facility, structures and/or work area;~~,~~ removing surplus	☐	☐	☐	☐	☐	

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	materials from the site when winter activity finished where applicable, annual inspection and repairs completed ~~prior to winter season where appropriate~~ when practical;~~,~~ evaluate the opportunity to reduce or reuse the wash water ~~proper disposal of wash water from trucks/spreaders~~, etc.						
5.	Calibrate all salt spreading equipment at least annually before November 30th. Records of the calibration results must be maintained for each piece of spreading equipment.	☐	☐	☐	☐	☐	
6.	Pre-wet road salt before use, either by applying liquids to the salt stockpile, or by applying liquids by way of the spreading equipment as the salt is deposited on the road.	☐	☐	☐	☐	☐	
7.	~~Purchase~~ Use equipment to m~~M~~easure the pavement temperature unless such ~~using~~ equipment has already been installed on road salt spreading vehicles.	☐	☐	☐	☐	☐	
8.	Develop and implement a protocol to vary the salt application rate based on pavement temperature, existing weather conditions, and forecasted weather conditions.	☐	☐	☐	☐	☐	
9.	Track and record salt quantity used and storm conditions from each call-out.	☐	☐	☐	☐	☐	
10.	Develop a written plan ~~must~~ for implementation of anti-icing, with milestones. The plan should consider increased use of liquids (e.g., carbohydrate products) beginning with critical locations such as bridges over	☐	☐	☐	☐	☐	

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	streams.						
11.	Provide employees involved in winter maintenance operations with annual training before November 30th on best management practices in the use of road salt in operations, including the practice of plowing first and applying salt only after snow has been cleared.	☐	☐	☐	☐	☐	
12.	Be responsible for complying with all applicable BMPs even when deicing practices are contracted out and ensure that contractors are ~~property~~ properly trained and comply with all applicable BMPs.	☐	☐	☐	☐	☐	
13.	Complete an annual report, which is standardized in an electronic format and submit~~ted through~~ to IEPA~~'s website~~ and ~~to~~ the watershed group.	☐	☐	☐	☐	☐	
14.	Install equipment to measure the pavement temperature on the winter maintenance fleet for a sufficient number of vehicles to provide sufficient information to adjust application rates for the most efficient levels. Develop and complete a plan to equip the winter maintenance fleet before the first re-evaluation.			☐	☐	☐	
15.	Before the first re-evaluation, develop a method for conducting a post-winter review to identify areas of success and areas in need of improvement. Items to be completed as part of the review must include, but are not limited to, an evaluation of each salt spreader's application rate, variations in application rates,			☐	☐	☐	

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	and discussion of the variation compared to the recommended rates. Once developed, the review should occur annually in the spring/early summer following each winter season.						
16.	For working areas, provide berms and or sufficient slope 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.	□	□	□	□	□	
17.	Obtain and put into place equipment necessary to enable implementation of all salt spreading/deicing measure specified in this BMP, such as any new or retrofitted salt spreading equipment necessary to allow for pre-wetting and proper rates of application.	□	□	□	□	□	
18.	Use deicing material storage structures for all communities covered under General Permit ILR40 for MS4 communities.			□	□		
A.	~~Store a~~All salt will be stored on an impermeable pad ~~that must be~~ constructed to ensure that minimal stormwater ~~is coming~~ comes into contact with salt.						□
B.	Pads ~~must~~ will be constructed to ~~avoid drainage onto the pad~~ direct stormwater away from the salt pile. ~~Any drainage that enters the pad should be directed to a stormwater retention pond.~~ The permittee should consider						□

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	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 tarps 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.	~~At salt piles and during salt loading/unloading operations, implement g~~ Good housekeeping ~~policies to prevent or reduce salt runoff,~~ 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 ~~and loading;~~~~,~~ cleanup of loading and spreading equipment after each snow/ice event, a written inspection program for storage facility, structures and/or work area;~~,~~ ~~removing surplus materials from the site when winter activity finished where applicable,~~ annual inspection and repairs completed ~~prior to winter season where appropriate~~ when practical;~~,~~ evaluate the opportunity to reduce or reuse the wash water ~~proper disposal of wash water from trucks/spreaders~~, etc.						

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
E.	Annual training must be conducted for employees responsible for loading/unloading/handling at docks and trucks at the facility.						
F.	~~Complete a~~ 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. ~~, which is standardized in an electronic format and submitted through IEPA's website and to the watershed group.~~						
G.	The Permittee must participate in a Chlorides workgroup for the CAWS or LDPR, depending on the watershed within which the facility's discharge is located.						
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 ~~taper~~ 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 or in						

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	a separate basin, or the impacted stormwater could be stored and used as pre-wetting brine.						

Joint Pet. at 2.8 - 2.19, 9.4 – 9.11; Rec. Att. 3.

Table 4: Implementation Schedules

	Implementation Schedules	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
Individual dischargers covered under the Time Limited Water Quality Standard for Chloride (PCB 16-14 (Consolidated)) must meet the following deadlines as applicable and indicated below for each discharger type:							
1.	**6 months after effective date of TLWQS:** Establish a mechanism for tracking of de-icing salt usage for each facility.	☐	☐	☐	☐	☐	☐
	Prepare a Pollutant Minimization Program and submit to IEPA.	☐	☐	☐	☐	☐	☐
2.	**EVERY YEAR beginning with YEAR 2 by July 1:** Submit Annual Report regarding salt usage for deicing and steps taken to minimize chloride salt usage to IEPA and make report publicly available.	☐	☐	☐	☐	☐	☐
	Submit progress report on evaluation of water softening chemical substitution options to IEPA.		☐				
3.	**EVERY YEAR beginning with YEAR 2 by November 30:** Complete annual training of all salt applicator personnel, including both employees and contractors, on Best Management Practices in minimizing the use of chloride salt in deicing.	☐	☐	☐	☐	☐	☐

	Implementation Schedules	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
Chloride Workgroups comprised of individual dischargers covered under the Time Limited Water Quality Standard for Chloride (PCB 16-14 (Consolidated)) must meet the following deadlines:							
	YEAR 3 by July 1: Chloride Workgroups each submit Status Report to IEPA.						
	YEAR 4: Chloride Workgroups collectively submit to the Board their proposed re-evaluation pleading consistent with the Board's Order granting the TLWQS.						
	YEAR 8 by July 1: Chloride Workgroups each submit Status Report to IEPA.						
	YEAR 9: Chloride Workgroups collectively submit to the Board their second proposed re-evaluation pleading consistent with the Board's Order granting the TLWQS or the Board's Order adopting the first re-evaluation.						
	YEAR 13 by July 1: Chloride Workgroups each submit Status Report to IEPA.						
	YEAR 14: Chloride Workgroups collectively submit to the Board a notice of whether the chloride water quality standards, current at the time, have been met, or whether the dischargers covered under this TLWQS will seek a new TLWQS.						

CERTIFICATE OF SERVICE

I, STEFANIE N. DIERS, Assistant Counsel for the Illinois EPA, certify that I have served a copy of the foregoing NOTICE OF FILING and the IEPA'S POST HEARING COMMENTS, 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 April 21, 2020.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

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

DATED: April 21, 2020

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