

ILLINOIS POLLUTION CONTROL BOARD

April 21, 2020

VILLAGE OF HOMEWOOD, HOMEWOOD)	
ILLINOIS, VILLAGE OF ORLAND PARK,)	
ORLAND PARK ILLINOIS, VILLAGE OF)	
MIDLOTHIAN, MIDLOTHIAN ILLINOIS,)	
VILLAGE OF TINLEY PARK, TINLEY PARK)	PCB 16-14 (Homewood)
ILLINOIS, EXXONMOBIL OIL CORPORATION,)	PCB 16-15 (Orland Park)
VILLAGE OF WILMETTE, WILMETTE)	PCB 16-16 (Midlothian)
ILLINOIS, CITY OF COUNTRY CLUB HILLS,)	PCB 16-17 (Tinley Park)
COUNTRY CLUB HILLS ILLINOIS,)	PCB 16-18 (ExxonMobil)
NORAMCO-CHICAGO, INC., FLINT)	PCB 16-20 (Wilmette)
HILLS RESOURCES JOLIET, LLC, CITY OF)	PCB 16-21 (Country Club Hills)
EVANSTON, EVANSTON ILLINOIS,)	PCB 16-22 (Noramco-Chicago)
VILLAGE OF SKOKIE, SKOKIE ILLINOIS,)	PCB 16-23 (INEOS Joliet)
ILLINOIS DEPARTMENT OF)	PCB 16-25 (Evanston)
TRANSPORTATION, METROPOLITAN WATER)	PCB 16-26 (Skokie)
RECLAMATION DISTRICT OF GREATER)	PCB 16-27 (IDOT)
CHICAGO, VILLAGE OF RICHTON PARK,)	PCB 16-29 (MWRDGC)
RICHTON PARK ILLINOIS, VILLAGE OF)	PCB 16-30 (Richton Park)
LINCOLNWOOD, LINCOLNWOOD ILLINOIS,)	PCB 16-31 (Lincolnwood)
CITY OF OAK FOREST, OAK FOREST ILLINOIS,)	PCB 16-33 (Oak Forest)
VILLAGE OF LYNWOOD, LYNWOOD ILLINOIS,)	PCB 19-7 (Village of Lynwood)
CITGO HOLDINGS, INC., VILLAGE OF NEW)	PCB 19-8 (Citgo Holdings)
LENOX, NEW LENOX ILLINOIS, CITY OF)	PCB 19-9 (New Lenox)
LOCKPORT, LOCKPORT ILLINOIS,)	PCB 19-10 (Lockport)
CATERPILLAR, INC., CITY OF CREST HILL,)	PCB 19-11 (Caterpillar)
CREST HILL ILLINOIS, CITY OF JOLIET,)	PCB 19-12 (Crest Hill)
JOLIET ILLINOIS, MORTON SALT, INC.,)	PCB 19-13 (Joliet)
CITY OF PALOS HIEGHTS, PALOS HEIGHTS)	PCB 19-14 (Morton Salt)
ILLINOIS, VILLAGE OF ROMEOVILLE,)	PCB 19-15 (Palos Heights)
ROMEOVILLE ILLINOIS, IMTT ILLINOIS LLC,)	PCB 19-16 (Romeoville)
STEPHA CO., VILLAGE OF PARK FOREST,)	PCB 19-17 (IMTT Illinois)
PARK FOREST ILLINOIS, OZINGA READY MIX)	PCB 19-18 (Stepan)
CONCRETE, INC., OZINGA MATERIALS, INC.,)	PCB 19-19 (Park Forest)
MIDWEST MARINE TERMINALS LLC.,)	PCB 19-20 (Ozinga Ready Mix)
VILLAGE OF MOKENA, MOKENA ILLINOIS,)	PCB 19-21 (Ozinga Materials)
VILLAGE OF OAK LAWN, OAK LAWN)	PCB 19-22 (Midwest Marine)
ILLINOIS, VILLAGE OF DOLTON, DOLTON)	PCB 19-23 (Mokena)
ILLINOIS, VILLAGE OF GLENWOOD,)	PCB 19-24 (Oak Lawn)
GLENWOOD ILLINOIS, VILLAGE OF MORTON)	PCB 19-25 (Dolton)
GROVE, MORTON GROVE ILLINOIS, VILLAGE)	PCB 19-26 (Glenwood)
OF LANSING, LANSING ILLINOIS, VILLAGE OF)	PCB 19-27 (Morton Grove)
FRANKFORT, FRANKFORT ILLINOIS,)	PCB 19-28 (Lansing)
VILLAGE OF WINNETKA, WINNETKA)	PCB 19-29 (Frankfort)
ILLINOIS, VILLAGE OF LA GRANGE, LA)	PCB 19-30 (Winnetka)
GRANGE ILLINOIS, INOREDION, INC.,)	PCB 19-31 (La Grange)
VILLAGE OF CHANNAHON, CHANNAHON)	PCB 19-33 (Channahon)

ILLINOIS, COOK COUNTY DEPARTMENT OF)	PCB 19-34 (CCDTH)
TRANSPORTATION AND HIGHWAYS,)	PCB 19-35 (Niles)
VILLAGE OF NILES, NILES ILLINOIS, SKYWAY)	PCB 19-36 (Skyway)
CONCENSSION COMPANY LLC, VILLAGE OF)	PCB 19-37 (Elwood)
ELWOOD, ELWOOD ILLINOIS, CITY OF)	PCB 19-38 (Chicago)
CHICAGO, CHICAGO ILLINOIS, VILLAGE OF)	PCB 19-40 (Crestwood)
CRESTWOOD, CRESTWOOD ILLINOIS, and)	PCB 19-48 (Riverside)
VILLAGE OF RIVERSIDE, RIVERSIDE)	(Time-Limited Water Quality
ILLINOIS,)	Standard)
)	(Consolidated)
Petitioners,)	
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on April 21, 2020, OZINGA READY MIX CONCRETE, INC., OZINGA MATERIALS, INC. and MIDWEST MARINE TERMINALS LLC, electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the **Petitioners Ozinga Ready Mix Concrete, Inc., Ozinga Materials, Inc., and Midwest Marine Terminals, LLC’s Post Hearing Brief in Support of Their Petitions to the Pollution Control Board**, a copy of which are hereby served upon you.

Dated: April 21, 2020

**OZINGA READY MIX CONCRETE, INC.,
OZINGA MATERIALS, INC., and
MIDWEST MARINE TERMINALS LLC**

By: /s/ Richard S. Porter
One of Its Attorneys

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PROOF OF SERVICE

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **Petitioners Ozinga Ready Mix Concrete, Inc., Ozinga Materials, Inc., and Midwest Marine Terminals, LLC's Post Hearing Brief in Support of Their Petitions to the Pollution Control Board** to be served via E-mail on the 21st day of April, 2020 to:

See Attached Service List

/s/ Richard S. Porter

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

VILLAGE OF HOMEWOOD, HOMEWOOD)	
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)	(Time-Limited – Water – Quality
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)	(Consolidated)
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Petitioners,.)	

PETITIONERS OZINGA READY MIX CONCRETE, INC., OZINGA MATERIALS, INC., AND MIDWEST MARINE TERMINALS, LLC’S POST HEARING BRIEF IN SUPPORT OF THEIR PETITIONS TO THE POLLUTION CONTROL BOARD

Now come Petitioners, Ozinga Ready Mix Concrete, Inc. (PCB 19-20); Ozinga Materials, Inc. (PCB 19-21), and Midwest Marine Terminals, LLC (PCB 19-22) (collectively “Ozinga Petitioners”), by and through their attorneys, HINSHAW & CULBERTSON LLP, and in furtherance of their respective Petitions for Time Limited Water Quality Standard, state as follows:

I. BACKGROUND

In July 2015, the Metropolitan Water Reclamation District of Greater Chicago (MWRD) and a number of impacted municipalities and entities commencing numerically with the City of Homewood, Illinois’ Petition for a Variance from the Chloride Standards (PCB 16-14) sought variances from the Illinois Pollution Control Board’s (“Board”) chloride standards then recently adopted in Water Quality Standards And Effluent Limitations for the Chicago Area Waterway System and Lower Des Plaines River Proposed Amendments to 35 Ill. Adm. Code 301, 302, 303, and 304, R08-9(D) (June 18, 2015) (“CAWS”). The Board consolidated these petitions and they were converted to TLWQS petitions by operation of law in February 2017.

After necessary amendments and filings by further petitioners, MWRD on July 24, 2018, filed an Amended Joint Petition for a Chloride Time-Limited Water Quality Standard

("TLWQS") under the Part 104, subpart E of the Pollution Control Board's ("PCB") procedural rules. 35 IL Admin. Code 104, subpart E. The Board found the Joint Amended Petition to be in substantial compliance with the Environmental Protection Act and Board regulations and this consolidated matter now involves 48 Petitioners, each seeking to be covered by Chloride TLWQS for their respective facilities' discharges into portions of the Des Plains River watershed and portions of the Chicago Area Waterways System.

The Board's duly appointed hearing officer conducted a hearing on February 18, 2020 in which the aforementioned Ozinga Petitioners provided written and live testimony by Michael Saldarelli, P.E. and submitted supporting exhibits. Mr. Saldarelli is the Director of Environmental Compliance at Ozinga Bros., Inc. and a practicing environmental engineer for fifteen years. He has been with Ozinga since 2015. He appeared on behalf of the three named entities and their 10 collectively impacted facilities referenced in the respective petitions. The Ozinga Petitioners also attach and incorporate Exhibits A through E from his testimony hereto which were admitted during the public hearing. All ten Ozinga Petitioners' facilities fall within the Board's "industrial sources" category of facilities. Three of these facilities also fall within the Board's "salt storage facilities" category. *See, Village of Homewood*, PCB 16-14 (cons.) slip op. at 2 (April 12, 2017)(discussing categories of facilities).

II. ADOPTION OF MWRD BRIEF

The Ozinga Petitioners support and are committed to the implementation of the proposed time-limited water quality standards for the Chicago Area Waterways System and the Des Plains River Watershed. The Ozinga Petitioners adopt and incorporate the Post Hearing Brief of Metropolitan Water Reclamation District of Greater Chicago, filed on April 20, 2020 and agree that the Board does not have legal authority to impose the seven requirements for work groups

enumerated by MWRD including conducting outreach, education and identification of nonpoint sources. The Ozinga Petitioners also agree that the Pollutant Minimization Plans (PMPs) should not be subjected to comment from the general public. The Best Management Practices (BMPs) have been the subject of substantial public comment and the PMPs simply memorialize the implementation of the BMPs. To subject Ozinga to public comment over its methodology of implementation the BMPs would be unnecessarily costly, infringe on the lawful operations of its businesses and defeat the purpose of bringing a joint petition for TLWQS. The Ozinga Petitioners hereby adopt the proposed amendments to the BMPs proposed by MWRD and propose certain additional changes to the BMPs.

III. PROPOSED AMENDMENT TO INDUSTRIAL AND SALT STORAGE BMPs

The Ozinga Petitioners urge the Board that if it issues BMPs such be amended per the “redline” of Ex. E attached hereto. At the hearing Michael Saldarelli, P.E. proposed certain minor changes to the BMPs which are necessary for effective, rational, and safe salt storage. First, proposed BMP 4 should be revised to allow the annual inspection report to be completed “when practical” as opposed to being required prior to the winter season. This will take into account ever varying seasonality and adaptative management adjustments advocated by the Illinois Environmental Protection Agency (“Illinois EPA”) throughout its June 5, 2019 Recommendation in response to the collective Petitioners’ Joint Submittal. *See*, Illinois EPA’s Recommendation, PCB 16-14 (cons.), at 12-15, 24 (June 5, 2109). Further the tarping of trucks and removal of surplus materials should not be universally required when such may be unnecessary to reduce salt runoff.

Second, proposed BMP 16 should be revised to make clear that it does not mandate berms and, instead, the use of berms is based on analysis and determination of whether such is necessary or effective, particularly, *e.g.*, in situations where salt piles have been tarped or are under a cover

or other engineered barriers or solutions are employed. Of important note, Illinois EPA's testifying representative, Scott Twait, advocating for the Agency-submitted BMPs, testified as to the Agency's agreement that "there are several ways other than berming that one who stores salt can use to minimize stormwater coming into contact with salt piles" and that "it may be unnecessary for a best management practice to include berming". Transcript at 164. Further, that there are "possibly" methods "beyond just berming and sloping that could be utilized to accomplish the same purpose", (Transcript at 166) at one point testifying that "the language does not specify that berms have to be used". Transcript at 165. Further, that "bermed" can refer to both mobile and permanent berms. Transcript at 166-167. As such, it appears clear that the agency charged with enforcement of the Code agrees with such a clarification.

Similarly, the BMPs as to salt storage facilities should be amended. Particularly BMP B should be amended as it references "storm water retention" ponds which may not be used, practical or necessary depending on the construction of the facility. Likewise, BMPs D, H, I and J should be amended as reflected in Exhibit E for the same reasons as the proposed amendments to BMPs 4 and 16.

IV. THE AMENDED OZINGA INDIVIDUAL SUBMITTALS SHOULD BE ALLOWED.

At the public hearing the Ozinga Petitioners admitted into evidence Three Amended Individual Submittals in Support of Petition for Chloride Time-Limited Water Quality Standard for the Defined Chicago Area/Des Plaines River Water Shed which are attached hereto as Exhibits B, C and D. As to Exhibit B the Individual Submittal for the facility at 11400 Old Lemont Road, Lemont, Illinois 60439, which is referenced in Petition PCB 2019-20, is amended to reflect that the facility is not only an industrial source but is also a salt storage facility and Ozinga Ready Mix

Concrete Inc. will implement all of the Best Management Practices for both categories. Exhibit C is the Amended Individual Submittal for the Ozinga Materials, Inc. site at 13100 South Ashland Avenue, Calumet Park, Illinois, referenced in Petition PCB 2019-21 to reflect that it too has a salt storage operation. Further, the NPDES Permit for the Calumet Park facility was pending when the Petition was originally filed and Permit No. ILR007572 has now been issued and such is referenced in the Amended Individual Submission. Finally, Exhibit D is the Amended Individual Submittal for the Midwest Marine Terminals LLC site at 11701 South Torrence Avenue, Chicago, Illinois 60617, referenced in Petition 16-22, which also has a salt storage operation requiring amendment of the submittal. Accordingly Paragraphs 8 and 14 of Exhibits, B, C and D have been amended to reflect that the Best Management Practices for both industrial and salt storage facilities will be followed.

The Illinois Code of Civil Procedure has been adopted by the Board and allows for liberal amendment of pleadings, including a complaint or petition, at any time to conform to the proof adduced at trial. 735 ILC 5/2-616(C); *Stanhibel v. Halt d/b/a Tom's Vegetable Market*, 2006 Ill.Env.Lexis 618, PCB No. 07-17 at *14 (March 1, 2006)(IPCB relies upon 2-616© for liberal allowance of amendment to a complaint). Therefore, the Amended Individual Submittals attached hereto as Exhibits B, C and D should be allowed and the record and order so reflect.

IV. CONCLUSION

The Ozinga Petitioners respectfully request that the Petitions Nos. 2019-20, 2019-21 and 2019-22 be granted and that the Amended Individual Submittals attached hereto as Exhibits, B, C and D be allowed and that the minor proposed changes reflected in Exhibit E to any adopted Best Management Practices be incorporated by the Board.

**OZINGA READY MIX CONCRETE,
INC., OZINGA MATERIALS, INC.,
and MIDWEST MARINE TERMINALS
LLC**

By: /s/ Richard S. Porter
One of their Attorneys

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ILLINOIS POLLUTION CONTROL BOARD

September 23, 2019

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VILLAGE OF OAK LAWN, OAK LAWN)	PCB 19-22 (Midwest Marine)
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GLENWOOD ILLINOIS, VILLAGE OF MORTON)	PCB 19-25 (Dolton)
GROVE, MORTON GROVE ILLINOIS, VILLAGE)	PCB 19-26 (Glenwood)
OF LANSING, LANSING ILLINOIS, VILLAGE OF)	PCB 19-27 (Morton Grove)
FRANKFORT, FRANKFORT ILLINOIS,)	PCB 19-28 (Lansing)
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CHICAGO, CHICAGO ILLINOIS, VILLAGE OF)	PCB 19-40 (Crestwood)
CRESTWOOD, CRESTWOOD ILLINOIS, and)	PCB 19-48 (Riverside)
VILLAGE OF RIVERSIDE, RIVERSIDE)	(Time-Limited Water Quality
ILLINOIS,)	Standard)
)	(Consolidated)
Petitioners,)	
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

NOTICE OF FILING

To: See Attached Service List

PLEASE TAKE NOTICE that on February 26, 2020, OZINGA READY MIX CONCRETE, INC., OZINGA MATERIALS, INC. and MIDWEST MARINE TERMINALS LLC, electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the **Testimony of Michael Saldarelli, P.E. in Support of Petitions PCB 2019-20, PCB 2019-21, and PCB 2019-22 with Exhibits A through E**, copies of which are hereby served upon you.

Dated: February 26, 2020

**OZINGA READY MIX CONCRETE, INC.,
OZINGA MATERIALS, INC., and
MIDWEST MARINE TERMINALS LLC**

By: /s/ Richard S. Porter
One of Its Attorneys

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PROOF OF SERVICE

The undersigned attorney certifies, under penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **Testimony of Michael Saldarelli, P.E. in Support of Petitions PCB 2019-20, PCB 2019-21, and PCB 2019-22 with Exhibits A through E** to be served via E-mail on the 26th day of February, 2020 to:

See Attached Service List

/s/ Richard S. Porter _____

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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS**

VILLAGE OF HOMEWOOD, HOMEWOOD)	
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ORLAND PARK ILLINOIS, VILLAGE OF)	
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VILLAGE OF TINLEY PARK, TINLEY PARK)	PCB 16-14 (Homewood)
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MIDWEST MARINE TERMINALS LLC.,)	PCB 19-20 (Ozinga Ready Mix)
VILLAGE OF MOKENA, MOKENA ILLINOIS,)	PCB 19-21 (Ozinga Materials)
VILLAGE OF OAK LAWN, OAK LAWN)	PCB 19-22 (Midwest Marine)
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GLENWOOD ILLINOIS, VILLAGE OF MORTON)	PCB 19-25 (Dolton)
GROVE, MORTON GROVE ILLINOIS, VILLAGE)	PCB 19-26 (Glenwood)
OF LANSING, LANSING ILLINOIS, VILLAGE OF)	PCB 19-27 (Morton Grove)
FRANKFORT, FRANKFORT ILLINOIS,)	PCB 19-28 (Lansing)
VILLAGE OF WINNETKA, WINNETKA)	PCB 19-29 (Frankfort)
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GRANGE ILLINOIS, INOREDION, INC.,)	PCB 19-31 (La Grange)
VILLAGE OF CHANNAHON, CHANNAHON)	PCB 19-33 (Channahon)

ILLINOIS, COOK COUNTY DEPARTMENT OF)	PCB 19-34 (CCDTH)
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VILLAGE OF NILES, NILES ILLINOIS, SKYWAY)	PCB 19-36 (Skyway)
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CHICAGO, CHICAGO ILLINOIS, VILLAGE OF)	PCB 19-40 (Crestwood)
CRESTWOOD, CRESTWOOD ILLINOIS, and)	PCB 19-48 (Riverside)
VILLAGE OF RIVERSIDE, RIVERSIDE)	(Time-Limited Water Quality
ILLINOIS,)	Standard)
)	(Consolidated)
Petitioners,)	
)	
v.)	
)	
ILLINOIS ENVIRONMENTAL PROTECTION)	
AGENCY,)	
)	
Respondent.)	

TESTIMONY OF MICHAEL SALDARELLI, P.E. IN SUPPORT OF PETITIONS PCB 2019-20, PCB 2019-21, AND PCB 2019-22

Petitioners Ozinga Ready Mix Concrete, Inc., Ozinga Materials Inc. and Midwest Marine Terminals LLC by and through their attorneys, Hinshaw & Culbertson LLP hereby file the testimony of Michael Saldarelli.

My name is Michael Saldarelli, I am the Director of Environmental Compliance at Ozinga Bros, Inc. and have personal knowledge regarding the operations and environmental law compliance of Ozinga Ready Mix Concrete, Inc., Ozinga Materials, Inc. and Midwest Marine Terminals LLC. I am a licensed professional engineer in the State of Illinois and have a Masters Degree in Engineering from the Stevens Institute of Technology and a Bachelor's of Science from the Rensselaer Polytechnic Institute. I have been a practicing environmental engineer for 15 years and employed by Ozinga Inc. since 2015. I have brought with me my CV that our attorney has marked as Exhibit A.

As Director of Environmental Compliance I am aware that Ozinga Ready Mix Concrete, Inc., Ozinga Materials, Inc and Midwest Marine Terminals LLC are committed to implementation of a Time-Limited Water Quality Standard for the defined Chicago Area Waterway System and the Des Plaines River Watershed. These companies appreciate the opportunity to participate in today's hearing and are grateful to the efforts of the Board, the Environmental Protection Agency and the other Petitioners in this important matter.

On behalf of these three (3) Companies, we filed PCB Petitions 2019-20, 2019-21 and 2019-22 concerning ten (10) separate facilities. In regards to PCB 2019-20, I executed individual submittals for eight (8) separate facilities on behalf of Ozinga Ready Mix Concrete Inc. PCB 2019-21 was brought on behalf of Ozinga Materials Inc. as to the facility at 13100 Ashland Avenue, Calumet Park, Illinois. PCB 2019-22 was brought on behalf of Midwest Marine

Terminals LLC as to its facility at 11701 South Torrence Avenue, Chicago, Illinois. When the Petitions were originally executed we identified the category of each of the ten facilities as “industrial” and that we agreed to comply with the industrial source Best Management Practices. Today we have with us Amended Individual Submittals as to (3) facilities which are not only industrial sources but also salt storage facilities. Specifically, the facility at 11400 Old Lemont Road, Lemont, Illinois 60439 is referenced in one of the Individual Submittals attached to Petition PCB 2019-20 and does have a salt storage operation and accordingly we are amending the Individual Submittal to identify it as not only an industrial source but also a salt storage facility and of course we agree to implement all of the Best Management Practices for both categories. Likewise as to Petition PCB 2019-21 the Ozinga Materials, Inc. site at 13100 South Ashland Avenue, Calumet Park, Illinois has salt storage operations as does the Midwest Marine Terminals LLC site at 11701 South Torrence Avenue, Chicago, Illinois 60617 and accordingly we are amending Paragraphs 8 and 14 of those Individual Submittals to reflect that we will comply with the Best Management Practices for both industrial and salt storage facilities. The Amended Individual Submittal as to 11400 Old Lemont Road, Lemont, Illinois, is being offered today as Exhibit B; the Amended Individual Submittal for the 13100 South Ashland Avenue, Calumet Park, Illinois is marked as Exhibit C and the Amended Individual Submittal for the Midwest Marine Terminals LLC facility at 11701 South Torrence Avenue, is marked as Exhibit D. In regard to Exhibit C the NPDES Permit was pending as to the Calumet facility when the Petition was originally filed, the permit has now been issued as Permit No. ILR007572 and we have referenced such on the Amended Petition.

The Joint and Individual Submittals clearly identify the reasons and necessity for the Petitions. Further, we have agreed to comply with the Best Management Practices for industrial and salt storage facilities. We do suggest that there be some minor changes to the Best Management Practices submitted by the IEPA which are reflected on our proposed changes to Table 3 which we have marked as Exhibit E. For the most part these changes are similar or identical to those proposed by the Morton Salt Company in its pre-filed testimony. The primary issues with the Best Management Practices are that annual inspection reports should be completed when practical as opposed to being required to be done prior to the winter season. Further the use of berms should not be mandatory and instead should be based on analysis and determination of whether such is necessary or effective particularly in situations where salt piles have been tarped or are under cover.

Accordingly we hereby offer Exhibits A – E and respectfully request that the Petitions Nos. 2019-20, 2019-21 and 2019-22 be granted and the minor proposed changes we have offered to the Best Management Practices be adopted.

I would be happy to answer questions if you have any.

Michael J Saldarelli Jr., PE

13 Shady Lane, Deer Park, IL 60010

Phone 773.368.2558

E-mail: msaldarelli@gmail.com

Work Experience

Director of Environmental Compliance

October 2015 to Present

Ozinga, Inc.

Mokena, IL

- Maintain and apply knowledge of current policies, new regulations and laws
- Ensure companywide compliance with federal and state environmental regulations.
- Maintain and apply knowledge of current policies, new regulations and laws
- Oversee all environmental compliance reviews and audits, ensuring corrective actions are completed on schedule
- Serve as primary contact for USEPA and state environmental agencies
- Report and/or review findings from environmental testing, ensuring all required reporting and testing is reported timely
- Oversee the Environmental Department personnel (2), managing priorities
- Guide the review and refinement of compliance-based training and SOPs by Operations and Environmental personnel; ensure it is conducted/reviewed and documented for all employees
- Familiarity with EPA regulations governing EPCRA, CAA and CWA

On-Site Environmental Engineer: BP

June 2012 to October 2015

Trinity Consultants

Whiting, IN

- Coordinates stack testing with the refinery, contractors and government agencies
- Coordinates and performs safety inspections in order for work to commence
- Performs budgeting and proposal activities with procurement and contractors
- Performs environmental reviews for various on-site projects
- Identifies environmental impacts for refinery expansion projects
- Identifies potential impacts related to air, waste, groundwater, stormwater and soil
- Interprets NSPS, NESHAP, Clean Air Act, and Clean Water Act Regulations
- Coordinates stack testing and CEMS calibration programs for the refinery
- Interprets Indiana and Federal environmental regulations

Infrastructure and Environment: Project Engineer

September 2011 to June 2012

URS Corporation

Chicago, IL

- Responsible for environmental compliance projects of various facilities
- Has written numerous proposals for a number of projects
- Leads financial and scheduling activities for short and long term projects
- Writes various air permit applications, including:
 - Title V Permits and Minor Source Permits
 - New Source Review Permits
 - Prevention of Significant Deterioration Permits

Corporate, Mergers and Acquisitions Advisory Services: Environmental Engineer

May 2007 to August 2011

GaiaTech, Inc.

Chicago, IL

- Performed and has written Phase I Environmental Site Assessments
- Determined compliance with OSHA, health and safety regulations
- Performed all sections of EPCRA hazardous chemical reporting
- Performed writing of various air permit applications
- Implemented NSPS, NESHAP, and Clean Air Act Regulations for facilities

EXHIBIT

A

Air Quality Permitting Element: Assistant Environmental Engineer

December 2004 to April 2007

New Jersey Department of Environmental Protection

Trenton, NJ

- Created Air Permits for Major Facilities for the State of New Jersey
- Participated in Facility-Department Negotiations to Create Regulations
- Analyzed Emission Test Results to Create Facility-Wide Policies

Education

Masters of Engineering, Systems Engineering, January 2007

Masters Certificate in Project Management, January 2007

Stevens Institute of Technology, Hoboken, NJ

Bachelors of Science, Biomedical Engineering, Mechanical Concentration, May 2004

Rensselaer Polytechnic Institute, Troy, NY

**Professional
Development**

Licensed Professional Engineer, State of Illinois

ILLINOIS POLLUTION CONTROL BOARD

Docket Numbers: PCB 2019-020, PCB 2019-021, PCB 2019-022
Time-Limited Water Quality Standard) (Consolidated)

AMENDED

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).

Individual Discharger Information

1. Facility Name of Individual Discharger: Ozinga Ready Mix Concrete Inc.

2. Owner/Operator of Facility: Ozinga Ready Mix Concrete Inc.

3. Address of Facility: 11400 Old Lamont Road, Lamont, Illinois 60439

4. Contact Information for Facility's Responsible Official:

Name: Michael Saldarelli Title: Director of Environmental Compliance

Mailing Address: 19001 Old Lagrange Road, Suite 300, Mokena, IL 60448

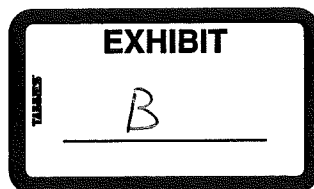
Phone Number: 708-326-4591 Email: michaelsaldarelli@ozinga.com

5. Permit Number of Facility (include both NPDES Permits and MS4 Permits that may be affected by the TLWQS): Permit No. ILR7572

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. Facility discharges to the: Chicago Area Waterway System (CAWS)
 Lower Des Plaines River (LDPR)

8. Select Category of Facility:
 POTW Community with CSO Outfalls Industrial Source MS4
 Illinois Department of Transportation/Tollway Salt Storage Facility

Location of Individual Discharger

9. 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 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 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

10. The specific discharge locations for the Facility are:

a. Outfall number(s): 1

b. General description of outfall location:

c. Outfall(s) appears on CAWS or LDPR list of Discharge Points (Joint Submittal Appendices 5 and 6): Yes No

TLWQS Requirements

11. Can the Facility achieve compliance with the chlorides standard by the compliance date? (*Only facilities that cannot achieve compliance are eligible for coverage by the TLWQS.*)

Yes No

12. (Optional) As referenced in Chapter 2 of the Joint Submittal, an Individual Discharger may provide supplemental information regarding any circumstances unique to the Facility regarding its inability to comply with the chlorides standard by the compliance date, including the nature and extent of the present or anticipated failure to meet the water quality standards and facts supporting that compliance with the water quality standards regulation cannot be achieved by any required compliance date.

13. 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

14. The Facility agrees to implement all of the BMPs included for the Industrial and Salt Storage Facility Category (from #8, above) for the Facility that are specified for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal.

15. Identify any past or currently in-use BMPs at the Facility for minimizing the discharge of chlorides.

The facility covers salt storage piles and performs deicing practices only on an as-needed basis.

16. 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:

The use of aqueous calcium chloride will be used as possible.

17. 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)? 1/20/2019

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)

Michael J. Saldarelli Jr.

Signature



Date Signed

2/18/2020

ILLINOIS POLLUTION CONTROL BOARD

Docket Numbers: PCB 2019-020, PCB 2019-021, PCB 2019-022
Time-Limited Water Quality Standard) (Consolidated)

AMENDED

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

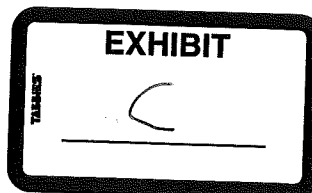
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An Individual Submittal must be made for each permitted Facility discharging to a reach in the Watershed defined by the Joint Submittal that seeks to be covered by the TLWQS in this Docket.

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).

Individual Discharger Information

1. Facility Name of Individual Discharger: Ozinga Materials Inc.
2. Owner/Operator of Facility: Ozinga Materials Inc.
3. Address of Facility: 13100 South Ashland Avenue, Calumet Park, Illinois 60827
4. Contact Information for Facility's Responsible Official:
Name: Michael Saldarelli Title: Director of Environmental Compliance
Mailing Address: 19001 Old Lagrange Road, Suite 300, Mokena, IL 60448
Phone Number: 708-326-4591 Email: michaelsaldarelli@ozinga.com
5. Permit Number of Facility (include both NPDES Permits and MS4 Permits that may be affected by the TLWQS): Permit No. ILR7572
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. Facility discharges to the: Chicago Area Waterway System (CAWS)
 Lower Des Plaines River (LDPR)
8. Select Category of Facility:
 POTW Community with CSO Outfalls Industrial Source MS4
 Illinois Department of Transportation/Tollway Salt Storage Facility

Location of Individual Discharger

9. 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 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 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

10. The specific discharge locations for the Facility are:

- a. Outfall number(s): 1
- b. General description of outfall location:

- c. Outfall(s) appears on CAWS or LDPR list of Discharge Points (Joint Submittal Appendices 5 and 6): Yes No

TLWQS Requirements

11. Can the Facility achieve compliance with the chlorides standard by the compliance date? (*Only facilities that cannot achieve compliance are eligible for coverage by the TLWQS.*)

Yes No

12. (Optional) As referenced in Chapter 2 of the Joint Submittal, an Individual Discharger may provide supplemental information regarding any circumstances unique to the Facility regarding its inability to comply with the chlorides standard by the compliance date, including the nature and extent of the present or anticipated failure to meet the water quality standards and facts supporting that compliance with the water quality standards regulation cannot be achieved by any required compliance date.

13. 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

14. The Facility agrees to implement all of the BMPs included for the Industrial and Salt Storage Facility Category (from #8, above) for the Facility that are specified for implementation in snow/deicing practices in Chapter 2 of the Joint Submittal.

15. Identify any past or currently in-use BMPs at the Facility for minimizing the discharge of chlorides.

The facility covers salt storage piles nad performs deicing practices only on an as-needed basis.

16. 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:

The use of aqueous calcium chloride will be used as possible.

17. 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.

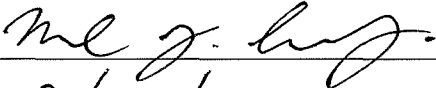
Has the Facility already developed a PMP to address its discharge of chlorides?
 Yes No

If Yes, what is the date of the (PMP)? 1/20/2019

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)	<u>Michael J. Saldarelli Jr.</u>
Signature	<u></u>
Date Signed	<u>2/18/2020</u>

ILLINOIS POLLUTION CONTROL BOARD

Docket Numbers: PCB 2019-020, PCB 2019-021, PCB 2019-022
Time-Limited Water Quality Standard) (Consolidated)

AMENDED

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

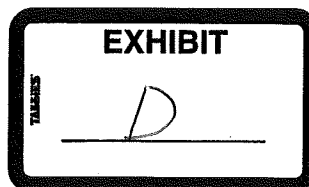
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Individual Discharger Information

1. Facility Name of Individual Discharger: Midwest Marine Terminals LLC
2. Owner/Operator of Facility: Midwest Marine Terminals LLC
3. Address of Facility: 11701 South Torrence Avenue, Chicago, IL 60617
4. Contact Information for Facility's Responsible Official:
Name: Michael Saldarelli Title: Director of Environmental Compliance
Mailing Address: 19001 Old Lagrange Road, Suite 300, Mokena, IL 60448
Phone Number: 708-326-4591 Email: michaelsaldarelli@ozinga.com
5. Permit Number of Facility (include both NPDES Permits and MS4 Permits that may be affected by the TLWQS): ILR006553
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. Facility discharges to the: Chicago Area Waterway System (CAWS)
 Lower Des Plaines River (LDPR)
8. Select Category of Facility:
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Location of Individual Discharger

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 Lake Calumet Connecting Channel, Calumet and Little Calumet Rivers, and
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 East Branch of Marley Creek

10. The specific discharge locations for the Facility are:

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- b. General description of outfall location:

- c. Outfall(s) appears on CAWS or LDPR list of Discharge Points (Joint Submittal Appendices 5 and 6): Yes No

TLWQS Requirements

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Yes No

12. (Optional) As referenced in Chapter 2 of the Joint Submittal, an Individual Discharger may provide supplemental information regarding any circumstances unique to the Facility regarding its inability to comply with the chlorides standard by the compliance date, including the nature and extent of the present or anticipated failure to meet the water quality standards and facts supporting that compliance with the water quality standards regulation cannot be achieved by any required compliance date.

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15. Identify any past or currently in-use BMPs at the Facility for minimizing the discharge of chlorides.

The facility covers salt storage piles and performs deicing practices only on an as-needed basis.

16. 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:

The use of aqueous calcium chloride will be used as possible.

17. 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)? 1/20/2019

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

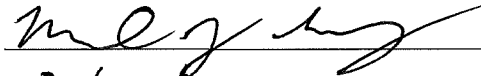
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Name & Official Title (Type or Print)

Michael J. Saldarelli Jr.

Signature



Date Signed

2/18/2020



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.	Participate in a Chlorides workgroup for the CAWS and LDPR <u>where applicable</u> .	✓	✓	✓	✓	✓	
2.	Store all salt on an impermeable pad that must be constructed to ensure that minimal stormwater is coming into contact with salt.	✓	✓	✓	✓	✓	
3.	Cover salt piles at all times except when in active use, unless stored indoors.	✓	✓	✓	✓	✓	
4.	At <u>Good housekeeping practices shall be implemented at</u> salt piles and during salt loading/unloading operations, implement good housekeeping policies to prevent or reduce salt runoff, including cleanup of salt at the end of each day or conclusion of a storm event, tarping of trucks, maintaining the pad and equipment, good practices during unloading <u>and loading and unloading</u> , cleanup of loading and spreading equipment after each snow/ice event, <u>a</u> 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, <u>proper when practical, and evaluate the opportunity to reuse of wash water.</u> disposal of wash water from trucks/spreaders, etc.	✓	✓	✓	✓	✓	
5.	Calibrate all salt spreading equipment at least annually before November 30th. Records of	✓	✓	✓	✓	✓	

Electronic Filing: Received, Clerk's Office 02/26/2020

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	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 equipment to measure the pavement temperature unless such 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 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	✓	✓	✓	✓	✓	

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	are property trained and comply with all applicable BMPs.						
13.	Complete an annual report, which is standardized in an electronic format and submitted through 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, 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.	<u>The permittee should consider using fixed and mobile berms where appropriate to redirect flow and taper over the edge of the pad where possible in order to minimize stormwater contact.</u> 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	✓	✓	✓	✓	✓	

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT / Tollway	Salt Storage Facilities
	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 all salt on an impermeable pad that must be constructed to ensure that minimal stormwater is coming into contact with salt.						✓
B.	Pads must <u>Where practical, pads will be constructed to avoid drainage onto the pad. Any direct stormwater away from the salt pile. The permittee should consider directing any drainage that enters the pad should be directed to a stormwater retention pond to a collection point where feasible.</u>						✓
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 good housekeeping policies to prevent or reduce salt runoff.						✓

	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT/Tollway	Salt Storage Facilities
D.	<p><u>Good housekeeping practices shall be implemented at salt piles and during salt loading/unloading operations.</u> including cleanup of salt at the end of each day or conclusion of a storm event, tarping of trucks, maintaining the pad and equipment, good practices during unloading and loading <u>and unloading</u>, cleanup of loading and spreading equipment after each snow/ice event, <u>a</u> 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, proper disposal <u>when practical, and evaluate the opportunity to reuse</u> of wash water from trucks/spreaders, etc.</p>						✓
E.	Annual training must be conducted for employees responsible for loading/unloading/handling at docks and trucks at the facility.						✓
F.	Complete an annual report, 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.	<u>The permittee should consider using fixed and mobile berms where appropriate to redirect flow and taper over the edge of the pad where possible in order to minimize stormwater</u>						✓

	contact. 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						
	Best Management Practice	POTWs	Industrial Sources	CSO Communities	MS4 Communities	IDOT/Tollway	Salt Storage Facilities
	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 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 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.