

**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	)	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,	)	
ILLINOIS,	)	
	)	
Petitioners,	)	
	)	
v.	)	(Time-Limited Water Quality
	)	Standard)
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Consolidated)
AGENCY,	)	
	)	
Respondent.	)	

**NOTICE OF FILING**

TO: See attached Service List

PLEASE TAKE NOTICE that on the 21<sup>st</sup> day of April, 2020, the City of Crest Hill electronically filed with the Office of the Clerk of the Illinois Pollution Control Board its **PETITIONER CITY OF CREST HILL'S ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO AND CONCURRENCE IN THE ARGUMENTS SET FORTH IN FAVOR OF A TIME LIMITED WATER QUALITY STANDARD**, a copy of which is hereby served upon you.

CITY OF CREST HILL

By: /s/Michael R. Stiff

Michael R. Stiff #06198327  
Christian G. Spesia #06226155  
SPESIA & TAYLOR  
1415 Black Road  
Joliet, Illinois 60435  
815-726-4311  
mstiff@spesia-taylor.com  
cspesia@spesia-taylor.com

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 attached **PETITIONER CITY OF CREST HILL'S ADOPTION OF POST-HEARING BRIEF OF METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO AND CONCURRENCE IN THE ARGUMENTS SET FORTH IN FAVOR OF A TIME LIMITED WATER QUALITY STANDARD** to be served *via electronic mail* on the 21<sup>st</sup> day of April, 2020 to:

See Attached Service List

/s/Michael R. Stiff

SERVICE LIST

[chris@CJCummingsLaw.com](mailto:chris@CJCummingsLaw.com); [Stefanie.Diers@Illinois.gov](mailto:Stefanie.Diers@Illinois.gov); [ettinger.albert@gmail.com](mailto:ettinger.albert@gmail.com);  
[Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov); [Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov); [lindsay.birt@gza.com](mailto:lindsay.birt@gza.com); [pfeifer.david@epa.gov](mailto:pfeifer.david@epa.gov);  
[melissa.brown@heplerbroom.com](mailto:melissa.brown@heplerbroom.com); [dgwalsh@ktjlaw.com](mailto:dgwalsh@ktjlaw.com); [suhler@ktjlaw.com](mailto:suhler@ktjlaw.com); [eklavery@ktjlaw.com](mailto:eklavery@ktjlaw.com);  
[smeyers@openlands.org](mailto:smeyers@openlands.org); [mkordas@openlands.org](mailto:mkordas@openlands.org); [pmmlawyer@aol.com](mailto:pmmlawyer@aol.com); [pcoblentz@rmcj.com](mailto:pcoblentz@rmcj.com);  
[ASamuelson@rmcj.com](mailto:ASamuelson@rmcj.com); [john@avlawoffice.net](mailto:john@avlawoffice.net); [aruggie@cityofevanston.org](mailto:aruggie@cityofevanston.org);  
[hdubose@cityofevanston.org](mailto:hdubose@cityofevanston.org); [dstoneback@cityofevanston.org](mailto:dstoneback@cityofevanston.org); [Lott@cityofevanston.org](mailto:Lott@cityofevanston.org);  
[mml@skokie.org](mailto:mml@skokie.org); [james.mccarthy@skokie.org](mailto:james.mccarthy@skokie.org); [Matthew.Dougherty@Illinois.gov](mailto:Matthew.Dougherty@Illinois.gov); [fandes@btlaw.com](mailto:fandes@btlaw.com);  
[pdrucker@btlaw.com](mailto:pdrucker@btlaw.com); [Margaret.conway@mwr.org](mailto:Margaret.conway@mwr.org); [pfeifer.david@epa.gov](mailto:pfeifer.david@epa.gov);  
[andrew.fiske@elrodfriedman.com](mailto:andrew.fiske@elrodfriedman.com); [suhler@ktjlaw.com](mailto:suhler@ktjlaw.com); [eklavery@ktjlaw.com](mailto:eklavery@ktjlaw.com);  
[MAROVICH@HDOML.COM](mailto:MAROVICH@HDOML.COM); [jeffrey.fort@dentons.com](mailto:jeffrey.fort@dentons.com); [MStiff@spesia-taylor.com](mailto:MStiff@spesia-taylor.com);  
[swilliams@lockport.org](mailto:swilliams@lockport.org); [mshanahan@jolietcity.org](mailto:mshanahan@jolietcity.org); [awyss@joliet.gov](mailto:awyss@joliet.gov); [eboyd@thompsoncoburn.com](mailto:eboyd@thompsoncoburn.com);  
[tbriscoe@thompsoncoburn.com](mailto:tbriscoe@thompsoncoburn.com); [David.Rieser@klgates.com](mailto:David.Rieser@klgates.com); [Petienne@stepan.com](mailto:Petienne@stepan.com);  
[kg@nijmanfranzetti.com](mailto:kg@nijmanfranzetti.com); [lg@nijmanfranzetti.com](mailto:lg@nijmanfranzetti.com); [ffrazier@odelsonsterk.com](mailto:ffrazier@odelsonsterk.com);  
[rporter@hinshawlaw.com](mailto:rporter@hinshawlaw.com); [cbuck@rcklawfirm.com](mailto:cbuck@rcklawfirm.com); [tcondon@pjmchicago.com](mailto:tcondon@pjmchicago.com); [jdonahue@rmcj.com](mailto:jdonahue@rmcj.com);  
[tliston@mortongroveil.org](mailto:tliston@mortongroveil.org); [mwelch@montanawelch.com](mailto:mwelch@montanawelch.com); [gmahoney@msclawfirm.com](mailto:gmahoney@msclawfirm.com);  
[mmahoney@msclawfirm.com](mailto:mmahoney@msclawfirm.com); [jeff.fronczak@cookcountyil.gov](mailto:jeff.fronczak@cookcountyil.gov); [DG@VNILES.com](mailto:DG@VNILES.com);  
[bheinrich@vedderprice.com](mailto:bheinrich@vedderprice.com); [dmehlman@vedderprice.com](mailto:dmehlman@vedderprice.com); [dsilverman@msclawfirm.com](mailto:dsilverman@msclawfirm.com);  
[jared.policicchio@cityofchicago.org](mailto:jared.policicchio@cityofchicago.org); [DSosin@sosinarnold.com](mailto:DSosin@sosinarnold.com); [mdgoldich@KTJLAW.com](mailto:mdgoldich@KTJLAW.com);  
[ebailey@riverside.il.us](mailto:ebailey@riverside.il.us); [Alec.Messina@heplerbroom.com](mailto:Alec.Messina@heplerbroom.com)

**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	)	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,	)	
ILLINOIS,	)	
	)	
Petitioners,	)	
	)	
v.	)	(Time-Limited Water Quality
	)	Standard)
ILLINOIS ENVIRONMENTAL PROTECTION	)	(Consolidated)
AGENCY,	)	
	)	
Respondent.	)	

**PETITIONER CITY OF CREST HILL'S ADOPTION OF  
POST-HEARING BRIEF OF METROPOLITAN WATER  
RECLAMATION DISTRICT OF GREATER CHICAGO AND CONCURRENCE IN  
THE ARGUMENTS SET FORTH IN FAVOR OF A TIME LIMITED WATER  
QUALITY STANDARD**

Now comes Petitioner, City of Crest Hill (“Crest Hill”), by and through its attorneys, Michael R. Stiff and Spesia & Taylor, and pursuant to Orders entered herein by Hearing Officer Bradley P. Halloran in which the parties were granted permission to file post-hearing briefs in this matter, if they desired to do so, hereby makes the following its adoption of the Post-Hearing Brief filed by the Petitioner in PCB 16-29, Metropolitan Water Reclamation District of Greater Chicago (“MWRD”), and its concurrence in the MWRD’s arguments in favor of a Time Limited Water Quality Standard (“TLWQS”) for Chloride:

On April 20, 2021 MWRD filed with the Board its Post-Hearing Brief. In that brief, the MWRD clarified its position on several issues which are common to all Petitioners, including, initially, the question as to whether the Board has the legal authority to mandate certain requirements for the discharger workgroups.

In addition to the issue of authority, MWRD addresses the concerns raised by Openlands

## Electronic Filing: Received, Clerk's Office 04/21/2020

in its testimony at the February 2020 hearing, as well as commenting on the U.S. EPA's suggestion that additional conditions be placed on dischargers to go beyond the BMP's suggested and committed to by the petitioners in the Joint Petition.

MWRD suggests a methodology as to how the PMP's will be made public (through the respected work group website and suggests language to accomplish that. Further, MWRD argues against a further public comment requirement with respect to the PMP, noting that individual review would not fit into the permitting process, and that individual review of each PMP would be duplicative in light of the already extensive scrutiny (including opportunity for public comment) placed on the BMP's during these TLWQS proceedings.

Finally, MWRD addresses the issue of when the PMP's will be developed, and suggests a simple procedure in which the IEPA, after the Board approves the TLWQS, would re-open the Petitioner's permits for the limited purpose of adding the chloride standard and the TLWQS conditions.

Crest Hill hereby concurs with and adopts as and for its own Post-Hearing Brief the Post-Hearing Brief of MWRD in PCB 16-29, as and for its own Post-Hearing Brief. Crest Hill further states that the MWRD Post-Hearing Brief incorporates those arguments and positions Crest Hill endorses and advocates, except where they do not apply to the individual circumstances of Crest Hill as a POTW and MS4 discharger. To that extent, Crest Hill adopts all prior arguments and briefs of similarly situated Petitioners, and may, in its Response to the Initial Post-Hearing Briefs adopt and concur with the arguments and positions set forth by other similarly situated Petitioners. Crest Hill endorses in general principle the positions of MWRD in favor of granting the requested TLWQS.

Respectfully submitted,

By: /s/ Michael R. Stiff  
Attorney for Crest Hill

Michael R. Stiff #06198327  
Christian G. Spesia #06226155  
SPESIA & TAYLOR  
1415 Black Road  
Joliet, Illinois 60435  
Tel: 815-726-4311  
Email: [mstiff@spesia-taylor.com](mailto:mstiff@spesia-taylor.com)  
[cspesia@spesia-taylor.com](mailto:cspesia@spesia-taylor.com)