BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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

OF OAK LAWN, OAK LAWN ILLINOIS, VILLAGE OF OAK LAWN, OAK LAWN ILLINOIS, VILLAGE OF DOLTON, DOLTON 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 ILLINOIS, VILLAGE OF LA GRANGE, LA GRANGE ILLINOIS, INGREDION, INC., VILLAGE OF CHANNAHON, CHANNAHON ILLINOIS, COOK COUNTY 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 19-28 (Lansing) PCB 19-29 (Frankfort) PCB 19-30 (Winnetka) PCB 19-31 (La Grange) PCB 19-32 (Ingredion) 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 ELECTRONIC FILING

PLEASE TAKE NOTICE that on April 21, 2020, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, the RIVER ADVOCATES' POST HEARING COMMENTS, a copy of which is attached hereto and herewith served upon you.

Dated: April 21, 2020

Respectfully Submitted,

River Advocates
Friends of the Chicago River
Openlands
Sierra Club, Illinois Chapter

By:

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Senior Counsel
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POST HEARING COMMENTS OF FRIENDS OF THE CHICAGO RIVER, OPENLANDS AND SIERRA CLUB, ILLINOIS CHAPTER

FRIENDS OF THE CHICAGO RIVER, OPENLANDS and the SIERRA CLUB, ILLINOIS CHAPTER (collectively "River Advocates") by and through their attorneys,

submit the following post hearing comments regarding the petition for a Time Limited Water Quality Standard (TLWQS) for chloride, pursuant to PCB 2016-014.

I. Introduction

The River Advocates strongly recommend that the proposed TLWQS be amended to provide adequate monitoring, public participation and enforcement. Monitoring should be conducted throughout the watershed to protect sensitive species and other aquatic life uses that are now present in the Chicago Area Waterway System (CAWS) and Lower Des Plaines River (LDPR). The TLWQS should include conditions for public engagement and comment on plans submitted by petitioners as to how they will utilize specific best practices to reduce chloride levels in subject waterways, as well an annual review by the work group and subsequent amendments to these plans. All conditions, including implementation of Best Management Practices (BMPs), monitoring, and public engagement throughout the variance process, should be enforceable as permit conditions.

Founded in 1963, Openlands protects the natural and open spaces of Northeastern Illinois and the surrounding region to ensure cleaner air and water, protect natural habitats and wildlife, and help balance and enrich our lives. For decades, Openlands has supported improvements to the waterways of our region as natural assets, economic drivers and community treasures. Openlands and its supporters recreate on and along waterways that are affected by this proceeding. They paddle, watch wildlife, fish, hike and bike on trails and in parks along the riverbanks, and otherwise enjoy these natural resources. Overall, Openlands assists government, nonprofits, and community groups, and engages the public to enhance and protect water quality and aquatic habitats through planning, education, restoration projects, land preservation, and monitoring of streams and rivers throughout Northeastern Illinois and the

surrounding region. Openlands partners with state government agencies, municipalities, and other organizations to make our region's waterways more open and accessible for recreational use to connect people to nature where they live.

Openlands is one of the original organizations to partner with the Illinois Department of Natural Resources to develop and promote the first water trails throughout Northeastern Illinois. It has partnered with communities and agencies to install canoe and kayak launches and signage, and to hold workshops and events to engage local communities in paddling and stewarding their rivers, streams and lakes. Openlands offers canoeing and kayaking maps and brochures and maintains an interactive website for the public to learn about opportunities to paddle and enjoy trails across the region. For many years, Openlands has provided technical assistance to agencies and communities to acquire and preserve land to protect streams across the region. Openlands has conducted more than $50 million in wetland and stream restoration initiatives, improving aquatic habitat in degraded systems. Openlands provides technical assistance in acquiring riparian corridors to protect waterways, ranging from the pristine Kishwaukee River and Nippersink Creek, to the Chicago River system.

Openlands has utilized its experience to raise scientific evidence and scrutiny before the Illinois Pollution Control Board in past proceedings, such as the CAWS Water Quality Standards rulemaking (R08-09) and Amendments to the Water Quality Standards for Chlorides rulemaking (R18-32) to protect existing and attainable conditions for species that depend upon the quality of our region's waterways. In addition, Openlands works to protect headwater streams throughout the Chicago Wilderness region, which harbor the kinds of aquatic life at issue in this proceeding. In 2017, Openlands published the report *Headwater Streams of Chicago Wilderness: Status and Recommendations* as a resource for local governments and land

managers to better understand the value of headwater streams and the biodiversity they support. Through the guide and the breadth of our work, Openlands engages in land acquisition, restoration and policy strategies to preserve and protect these resources.

Friends of the Chicago River (Friends) is the only organization solely dedicated to protecting and enhancing the Chicago River for people, plants, and wildlife. Our Education and Outreach programs cultivate awareness and stewardship through countless field trips, opportunities to canoe, and our McCormick Bridgehouse Museum. We believe a broad base of popular support for the Chicago River is essential to the long-term success of efforts to improve it. Additionally, we focus on research and policy initiatives and partner with key agencies to help shape policies that have a systematic long-term impact on water quality, such as the TLWQS for chloride. Friends' On-the-Ground Projects physically improve the health of the Chicago and Calumet River systems. These projects provide healthy habitat, restore the rivers' health and cultivate community spirit. The hard work of Friends' staff and over 10,000 members, volunteers, and online advocates would be in jeopardy if standards for chloride are compromised. Friends' members would be adversely impacted by injuries to water quality in the manner detailed with regard to Openlands members above.

The Illinois Chapter of the Sierra Club has 100,000 members and supporters across Illinois who seek to restore and protect a clean and healthy environment for all residents in our state, including over 15,000 members who live and recreate in the Chicago River and Des Plaines River watersheds. The mission of the Sierra Club is to explore, enjoy and protect the planet, to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out those objectives. Our members make use of these bodies of water for activities including

birdwatching, fishing and other wildlife viewing that require clean water for thriving aquatic ecosystems.

The experience of the members and supporters of the River Advocates would be diminished by allowing a more lenient highest attainable condition and relaxed conditions in a TLWQS for chloride, which would ultimately result in greater pollution in these waters, making it more hostile for aquatic life to live and reach their potential. More of our supporters would recreate on these systems if the quality continued to improve and become "fishable and swimmable" under the Clean Water Act (CWA). The River Advocates are concerned with rising levels of chloride in the CAWS and the LDPR, which are vital to and relied upon by both human and wildlife communities.

II. Adequate Monitoring Is Essential to Protect Existing Aquatic Life Uses and Avoid Degradation of Water Quality in the CAWS and LDPR.

The monitoring proposed in the TLWQS is inadequate to assess compliance with the highest attainable condition in the CAWS and LDPR and ensure that water quality is not degraded throughout the watershed by introducing chloride concentrations that could harm existing (and attainable) aquatic life uses. It is insufficient to measure reductions of chloride discharged without correlation to impacts on the quality of the CAWS and LDPR. Taking a watershed-based approach does not mean turning a blind eye to protecting sensitive resources within the regulated waterways.

Petitioners have proposed a TLWQS that would assess compliance with the highest attainable condition at only two locations to extrapolate the cumulative impacts of chlorides across the entire watershed. This constrained approach would fail to provide the chlorides workgroup, local agencies and the public information necessary to understand the effects of

implemented BMPs. Despite Petitioners' repeated statements that adaptive management is critical to this process, J. Sub. at 2.2, the proposed monitoring would fail to provide adequate information regarding whether and where adjustments need to be made. Data that speaks only to the increases or decreases of chloride in the system as a whole, averaged over the entire season provides no guidance towards identifying whether and where BMPs are doing a better or worse job of controlling chloride pollution. Municipalities and other dischargers in the chlorides workgroup cannot realistically engage in an adaptive management approach without specific information connecting existing uses, chloride concentrations and BMPs.

Federal CWA regulations require that each state "develop and adopt a statewide antidegradation policy," providing at a minimum that "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." 40 C.F.R. § 131.12(a). The stated purpose of Illinois' antidegradation policy is "to protect existing uses of all waters of the State of Illinois, maintain the quality of waters with quality that is better than water quality standards, and prevent unnecessary deterioration of waters of the State." 35 Ill. Adm. Code § 302.105. This policy requires that existing uses attained after 1975 "must be maintained and protected" and specifically highlights examples of potential degradation, including "an action that would result in the deterioration of the existing aquatic community" or "an action that would result in a loss of a resident or indigenous species whose presence is necessary to sustain commercial or recreational activities." 35 Ill. Adm. Code § 302.105(a).

Furthermore, Illinois water quality standards for the CAWS and LDPR are required to protect "the highest quality aquatic life and wildlife that is attainable, limited only by the physical condition of these waters and hydrologic modifications to these waters." 35 Ill.

Adm. Code § 302.402. State and federal regulations specify that "[e]xisting instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected." 391-3-6-.03(2)(b); 40 C.F.R. § 131.12(a)(1). "Existing instream water uses include water uses actually attained in the waterbody on or after November 28, 1975." 391-3-6-.03(3)(e); 40 C.F.R. § 131.3(e).

The EPA has specified that "no activity is allowable...which could partially or completely eliminate any existing use." *Jefferson County*, 511 U.S. at 718-719, 114 S.Ct. at 1912 (citing EPA Questions and Answers on Antidegradation, number 8, page 3). Indeed, the antidegradation policy prohibits a project that replaces one fish community with another. Questions and Answers on Antidegradation, number 8, page 3. "Existing uses must be maintained in all parts of the water body segment." Questions and Answers on Antidegradation Number 11, page 5.

As explained by USEPA guidance, a "water quality standards variance is a time limited designated use and criterion (i.e., interim requirements) that is targeted to a specific pollutant(s), source(s), and/or waterbody segment(s) that reflects the highest attainable condition during the specified time period." *See* Discharger-specific Variances on a Broader Scale: Developing Credible Rationales for Variances that Apply to Multiple Dischargers, EPA-280-F-13-012 (Mar. 2013). A variance is a regulatory tool to allow progress towards attaining a designated use and criterion that is not currently attainable. Importantly, CWA regulations mandate that variances, such as the proposed TLWQS, "shall not result in any lowering of the currently attained ambient water quality…" 40 CFR § 131.14(b)(1)(ii).

Assessing compliance in only two downstream locations of more than 190 miles of waterways is inadequate to ensure that currently attained ambient water quality is not lowered

throughout the watershed. The TLWQS must protect the entire proposed area, not just the most downstream stretches. Moreover, it is inadequate for the variance to only consider water quality standards criteria without also looking at the existing uses that the criteria are established to protect. The reason that water quality cannot be degraded is to protect the designated uses in those waterways. Divorcing criteria from uses is contrary to the antidegradation rules and policies under the CWA, and the mandate under Section 131.14(b)(1)(ii) of the CWA regulations. Chloride discharges can spike in certain stretches with higher aquatic life use designations. These spikes will be mixed and diluted by the time they reach the stations miles downstream from where there are problems. Avoiding this result is critical because we know that aquatic life uses were identified in certain parts of the watershed that depend upon the current water quality and are intolerant to chlorides.

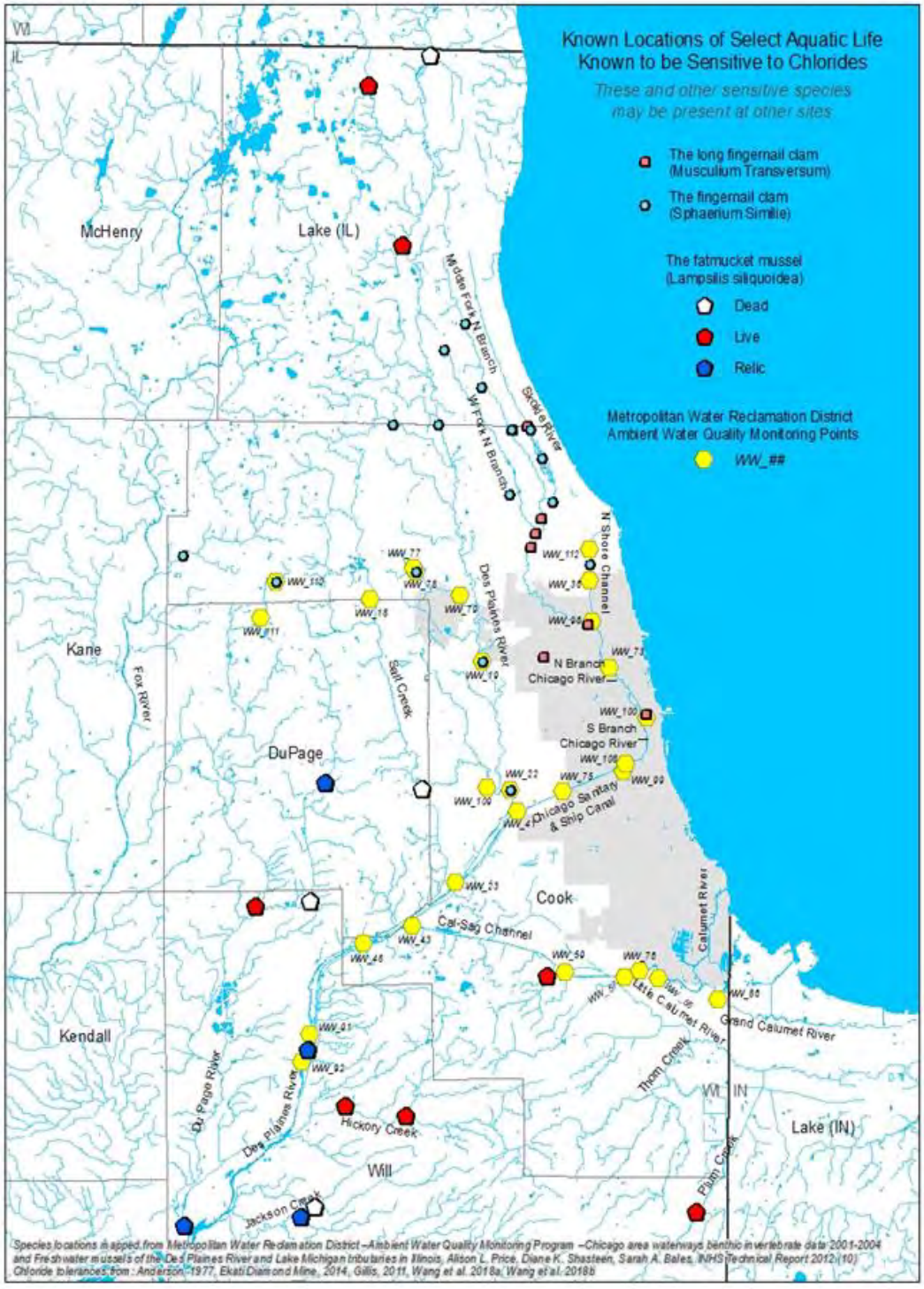
MWRD's website states that they collect hourly dissolved oxygen, temperature, and conductivity data at monitoring locations throughout their service area. *See* Chicago Area Waterways Water Quality Data, Continuous Dissolved Oxygen tab at https://gispub.mwrd.org/awqa/, last accessed Apr. 16, 2020. Data from stations where MWRD has hourly conductivity monitoring and monthly chloride data can be used to establish a relationship between the two that will result in site-specific equations allowing the estimation of hourly chloride concentrations from conductivity. These hourly data should be analyzed over time to track chloride concentrations at the stations.

The map below shows locations where a few species sensitive to chlorides, including the fat mucket mussel, and two species of fingernail clam, have been found within the CAWS, and the location of MWRD monitoring stations. In several cases, MWRD monitoring locations are in the same vicinity as known sensitive aquatic life. Hourly data on

chloride concentrations and analysis of trends in concentrations over time would provide insight into whether aquatic life uses are being protected in these locations and whether BMP implementation is helping to bring chloride concentrations closer to the standard at these points within the system. The species mapped below are simply a few for which we have *some* known locations. Studies have shown that fat mucket mussel larvae (*Lampsilis siliquoidea*) and fingernail clams (*Musculium transversum and Sphaerium simile*) are among the most sensitive species to chlorides. *See* Anderson 1977, ERM Rescan 2014, Gillis 2011, Wang et al. 2018a and 2018b. These species and other sensitive species may also exist elsewhere, and monitoring should take place at all available stations where hourly conductivity is collected.

Chlorides have been consistently shown to degrade aquatic life in waterways, which underscores the need to understand chloride levels and how they change over time throughout the CAWS and LDPR, and not just in areas where we know that we have the most sensitive species. In terms of chronic long-term effects on invertebrate assemblages, Wallace and Biastoch (2016) found that in streams in Toronto, Canada, the macroinvertebrate community demonstrated the most taxa changes (declining frequency and abundance of taxa sensitive to chloride and increasing frequency and abundance of taxa tolerant of chloride) at a threshold of approximately 50 to 90 mg Cl-/L. The authors point out that this is below the Canadian Water Quality Guideline of 120 mg Cl-/L for chronic exposure and suggest that chloride may be having nonlethal effects on the benthic macroinvertebrate communities in the Toronto, Ontario region. *See* Wallace and Biastoch (2016). Similarly, the DuPage River Salt Creek Work Group's research shows that chloride is one of the variables that best correlates with biodiversity of fish and macroinvertebrates in the Upper DuPage and Salt Creek river systems,

indicating that chlorides are a proximate stressor in these rivers. *See* DuPage River Salt Creek Workgroup, Chlorides and Winter Management, https://drscw.org/activities/chlorides-and-winter-management/, last accessed Apr. 17, 2020.



Increased monitoring should be a condition of the TLWQS, particularly where there are known existing species in these waters that are intolerant to chloride, and processes and infrastructure to monitor chloride and/or conductivity concentrations are in place. This will not be a hardship, since many of MWRD's Ambient Water Quality Monitoring Program locations already overlap and coincide with locations where intolerant species are known to be present. R. at 103-04. MWRD monitors at approximately 30 locations throughout the watershed area. It would not pose a substantial economic hardship to establish a relationship between conductivity and chlorides, and make available to the public chloride data at these existing stations. This would provide a fuller and more accurate indication of the success or failure of specific BMPs, the impacts to aquatic life uses and whether adjustments are required to avoid further degradation of water quality.

It was suggested during the hearing for this chloride TLWQS that it is not feasible to demonstrate a direct link between BMPs and chloride concentrations. R. at 116-17. Chloride concentrations are affected by weather as well as by influx of salts into a waterway. An example would be that a spring drought resulting in a lower volume of water within a waterway could cause the chloride concentration to go up (because there is less water to dilute the salts) even if a reduced amount of chlorides entered a waterway due to BMPs the winter before. However, the DuPage River Salt Creek Work Group is engaged in ongoing research to refine techniques and models that would allow a better understanding of how to take weather into account to reveal trends and comparisons of chloride concentrations in waterways. It is also likely that looking consistently at concentrations over time will reveal trends. In addition, if collected, chloride data could be related to flow within rivers and streams and chloride loadings could be calculated in order to increase our understanding of

how much salt is entering the waterways. For all of these reasons, it is essential that we collect chloride concentration data throughout the CAWS and LDPR to inform future analyses of the effectiveness of BMPs. Without these data, our ability to adapt our practices to protect aquatic life will not exist, and aquatic life will not be protected.

III. The TLWQS Must Provide for development of Pollution Minimization Plans, through a public process, for each Individual discharger and for the plans be enforceable as NPDES permit conditions.

During the February 18, 2020 IPCB hearing, the Illinois EPA indicated that each discharger would be required to develop a Pollution Minimization Plan (PMP), file an annual report detailing how the PMP is incorporated, and that annual report would be a public document filed with the Agency. R. at 139: 3-19. However, the Agency was not able to clarify at that time whether the PMP would be part of each individual permit, what public input would be allowed in developing the PMP or how the public could enforce the PMP should a discharger fail to follow its PMP. R. at 140: 3-14. These matters must be clarified and made an explicit part of the TLWQS.

As USEPA suggested in its comments, PMPs specific to each discharger should be added to each individual permit within a set time after the effective date of the TLWQS. The IPCB draft indicates the period should be six months. *See* Board Questions, Revised Potential Draft Order Language at 33, Table 4. Requirements necessary for implementation of a variance from a water quality standard must be included in the permit as enforceable conditions. 40 C.F.R. 131.14(c). Therefore, the PMPs should be included as enforceable conditions of each permit within at least six months of the variance's effective date. Doing so would ensure that the PMPs are subject to public scrutiny as part of modifying each NPDES permit.

The River Advocates believe that the best way to achieve this goal is for each discharger to be covered by the TLWQS to be required as a condition of its permit to develop a PMP within six months of the issuance of the permit. It should be further required that the PMP be proposed as a modification of the NPDES permit, that IEPA use its normal public notice and comment process for substantial modifications of a permit, and that, subject to changes found advisable by IEPA after comment, implementation of the PMP be made an explicit condition of the revised permit. Finally, a condition of each permit issued under the TLWQS should be that the permittee file an annual report describing how it has implemented the PMP requirement.

IV. The TLWQS Must Provide for an Assessment Mechanism to Track Success of BMP Implementation.

The TLWQS should require permittees taking advantage of the watershed approach to reducing chloride loading over the next 15 years to collectively fund a number of studies to assess the success of the implemented BMPs. Beside the additional chloride and conductivity monitoring needed as described above, *supra* at § II, study of the aquatic life uses present in the waterways is needed as well as an analysis of trends in chloride and conductivity. We recommend that the TLWQS require that a report be compiled on chloride sensitive aquatic life uses based on available, historic data. This data should be used to recommend a monitoring program designed to reassess the population of sensitive mussels, fish and macroinvertebrates in the waterways at years 5 and 10. This will provide an assessment of the impact that the BMP requirements of the TLWQS are having on the waterways' sensitive biota.

We also recommend that the TLWQS require that permittees fund an assessment of the trends in chloride and conductivity concentrations in the waterways. We envision a study similar to the one that the Illinois State Water Survey (ISWS) has conducted for the Fox River Study

Group on trends in nutrient-related parameters in the Fox River. *See* Getahun, Keefer, Chandrasekaran, and Zavelle (2019), at https://www.ideals.illinois.edu/handle/2142/103009, last accessed Apr. 21, 2020. The ISWS is also beginning work with the Illinois Department of Natural Resources Coastal Management Program on a water quality trends analysis for Lake Michigan and its tributaries. This has potential for synergy between the Lake Michigan study and the study we are proposing for the CAWS and LDPR to aid in assessing the progress being made in reducing chloride concentrations in the waterways. Initially this study could look at trends in the historic data where sufficient data are available for such analysis. Then the ISWS should be hired to, on an annual basis, reassess and provide an updated flow-normalized concentration value for chloride and conductivity at the downstream monitoring sites and each of the additional monitoring sites we have recommended and where sufficient data are available. This would provide the permittees making use of the TLWQS with continuous, yearly feedback on the impacts of their BMP implementation and allow for continuous adjustments to improve their salt reduction efforts if the trends are not showing continuous improvement.

V. Conclusion

The River Advocates believe that the TLWQS for chloride must include requirements for adequate monitoring and an assessment mechanism to track success of BMPs, protect existing aquatic life uses and ultimately avoid degradation of water quality in the CAWS and LDPR. Furthermore, the TLWQS should require the development of PMPs through a public process for each individual discharger and be an enforceable part of NPDES permit conditions. The River Advocates appreciate this opportunity to submit the above comments and recommendations for consideration.

Dated: April 21, 2020

Respectfully Submitted,

River Advocates
Friends of the Chicago River
Openlands
Sierra Club, Illinois Chapter

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on April 21, 2020, I served the attached via electronic mail, RIVER ADVOCATES' POST HEARING COMMENTS, to the participants listed on the attached Service List.

Respectfully Submitted,

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