

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

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

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 19-29 (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)  
)  
)  
)

**NOTICE OF FILING**

**TO:** See Attached Service List

**PLEASE TAKE NOTICE** that on August 21, 2020, Petitioner in PCB 19-12, THE CITY OF CREST HILL ("Crest Hill") electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the **POST-HEARING REPLY BRIEF OF THE CITY OF CREST HILL**, a copy of which is hereby served upon you.

Dated: August 21, 2020

Respectfully submitted,

City of Crest Hill

/s/ Michael R. Stiff

One of its Attorneys

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VILLAGE OF WILMETTE, WILMETTE	)	
ILLINOIS, CITY OF COUNTRY CLUB HILLS,	)	
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ILLINOIS, COOK COUNTY DEPARTMENT	)	PCB 19-26 (Glenwood)

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,

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)  
)  
)

**POST HEARING REPLY BRIEF OF THE CITY OF CREST HILL**

Based on all of the information submitted to date in this rulemaking, Crest Hill respectfully submits that it and the other Petitioners have met their burden in this matter and have sufficiently demonstrated, through competent evidence, that the requested Time-Limited Water Quality Standard (TLWQS) should be approved by the Board.

It should be noted that since the public hearing on this manner in February, the Petitioners, as a group, have worked with the IEPA and environmental groups to resolve certain issues which were raised during the hearing. Those discussions were in large part successful, and Crest Hill has no further reply on the proposed chloride variance language or the proposed permit procedure which Crest Hill believes will be submitted by IEPA.

As to the specific issue of outreach and education requirements/conditions suggested by IEPA with respect to the work groups, which was not able to be resolved, Crest Hill believes that evidence on the issue (and the position of the petitioners) was sufficiently presented during the hearing and adequately briefed in the initial post-hearing briefs, and no further reply is made at this time.

Crest Hill also adopts and incorporates the arguments and positions set forth in any Reply Briefs of similarly situated petitioners, except where they do not apply to the individual circumstances of Crest Hill.

Dated: August 21, 2020

Respectfully submitted,

City of Crest Hill

/s/ Michael R. Stiff

One of its Attorneys

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Christian G. Spesia #06226155  
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**CERTIFICATE OF SERVICE**

The undersigned attorney certified, under the penalties of perjury pursuant to 735 ILCS 5/1-109, that he caused a copy of the foregoing **POST-HEARING REPLY BRIEF OF THE CITY OF CREST HILL** to be served via electronic mail (from mburkybile@spesia-taylor.com) the 21st day of April, 2020 to the individuals listed on the attached service list.

/s/ Michael R. Stiff

Michael R. Stiff

**SERVICE LIST**

Bradley P. Halloran, Hearing Officer Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, IL 60601	Don Brown, Clerk of the Board Illinois Pollution Control Board James R. Thompson Center, Suite 11-500 100 W. Randolph Street Chicago, IL 60601
PCB 2016-014 Stefanie N. Diers Sara Terranova Illinois Environmental Protection Agency 1021 North Grand Avenue East P.O. Box 19276 Springfield, IL 62794-9276	PCB 2016-014 Christopher J. Cummings Christopher J. Cummings, P.C. 2014 Hickory Road Suite 205 Homewood, IL 60430
PCB 2016-014 Albert Ettinger Law Firm of Albert Ettinger 53 W. Jackson Suite 1664 Chicago, IL 60604	PCB 2016-015 Dennis Walsh E. Kenneth Friker Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477
PCB 2016-016 David J. Freeman Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd 631 E. Boughton Road Suite 200 Bolingbrook, IL 60440	PCB 2016-016 Peter Murphy 11800 S. 75 <sup>th</sup> Avenue Suite 101 Palos Heights, IL 60463
PCB 2016-017 Dennis Walsh Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477	PCB 2016-018 Michael P. Murphy Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711
PCB 2016-020 Dennis Walsh Erin K. Lavery Klein, Thorpe & Jenkins 15010 S. Ravinia Avenue Suite 17 Orland Park, IL 60477	PCB 2016-021 Amber M. Samuelson Peter D. Coblentz Rosenthal, Murphey, Coblentz & Donahue 30 N. LaSalle Street, Suite 1624 Chicago, IL 60602

<p>PCB 2016-022 John P. Antonopoulos Antonopoulos &amp; Virtel, PC 15419 127<sup>th</sup> Street Suite 100 Lemont, IL 60439</p>	<p>PCB 2016-023 Michael P. Murphy Alec Messina Heplerbroom, LLC 4340 Acer Grove Drive Springfield, IL 62711</p>
<p>PCB 2016-025 David Stoneback Lindsey Ott City of Evanston 555 Lincoln Street Evanston, IL 60201</p>	<p>PCB 2016-025 Alexandra B. Ruggie Hugh DuBose City of Evanston 2100 Ridge Road Evanston, IL 60201</p>
<p>PCB 2016-026 James G. McCarthy Michael M. Lorge Village of Skokie 5127 Oakton Street Skokie, IL 60077</p>	<p>PCB 2016-027 Matthew D. Dougherty Special Assistant Attorney General Illinois Dept. of Transportation 2300 S. Dirksen Parkway Springfield, IL 62764</p>
<p>PCB 2016-029 Margaret T. Conway Metropolitan Water Reclamation District 100 E. Erie Street Chicago, IL 60611</p>	<p>PCB 2016-030 Amber M. Samuelson Peter D. Coblentz Rosenthal, Murphey, Coblentz &amp; Donahue 30 N. LaSalle Street Suite 1624 Chicago, IL 60602</p>
<p>PCB 2016-031 Andrew N. Fiske Hart M. Passman Steven M. Elrod Holland &amp; Knight LC 131 S. Dearborn Street 30<sup>th</sup> Floor Chicago, IL 60603</p>	<p>PCB 2016-033 Erin K. Lavery Scott F. Uhler Dennis G. Walsh Klein, Thorpe &amp; Jenkins, Ltd. 20 N. Wacker Drive Suite 1660 Chicago, IL 60606</p>
<p>PCB 2019-7 Michael J. Marovich, Hiskes Dillner O Donnell Marovich Lapp Ltd 10759 W. 159th Street. Suite 201 Orland Park, IL 60467</p>	<p>PCB 2019-8 Jeffrey C. Fort Dentons US LLP 233 South Wacker Driver Suite 7800 Chicago, IL 60606-6404</p>



<p>PCB 2019-9 Michael R. Stiff Spesia and Taylor 1415 Black Road Joliet, IL 60435</p>	<p>PCB 2019-10 Sonni Choi Williams City of Lockport 222 East 9th Street Lockport , IL 60441</p>
<p>PCB 2019-11 Chuck Anthony Caterpillar Inc. 100 NE Adams St Peoria, IL 61629</p>	<p>PCB 2019-12 Michael R. Stiff Spesia and Taylor 1415 Black Road Joliet, IL 60435</p>
<p>PCB 2019-13 Martin J. Shanahan City of Joliet 150 West Jefferson Street Joliet, IL 60432</p>	<p>PCB 2019-14 Eric E. Boyd Tim Briscoe Thompson Coburn LLP 55 East Monroe Street Chicago, IL 60603</p>
<p>PCB 2019-15 Dennis G. Walsh Klein, Thorpe &amp; Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606</p>	<p>PCB 2019-16 Dennis G. Walsh Klein, Thorpe &amp; Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606</p>
<p>PCB 2019-17 David L. Rieser K &amp; L Gates, LLP 70 W. Madison Street Ste. 3100 Chicago, IL 60602</p>	<p>PCB 2019-18 Peter Etienne Stepan Company 1135 Skokie Boulevard Northbrook, IL 60062</p>
<p>PCB 2019-19 Felicia L. Frazier Odelson &amp; Sterk, Ltd. 3318 West 95th Street Evergreen Park, IL 60642</p>	<p>PCB 2019-20 Richard S. Porter Hinshaw &amp; Culbertson LLC 100 Park Ave. PO Box 1389 Rockford, IL 61105</p>

<p>PCB 2019-21  Richard S. Porter  Hinshaw &amp; Culbertson LLC  100 Park Ave.  PO Box 1389  Rockford, IL 61105</p>	<p>PCB 2019-22  Richard S. Porter  Hinshaw &amp; Culbertson LLC  100 Park Ave.  PO Box 1389  Rockford, IL 61105</p>
<p>PCB 2019-23  Carl R. Buck  Rathbun, Cservenyak &amp; Kozol, LLC  3260 Executive Drive  Joliet, IL 60431</p>	<p>PCB 2019-24  Thomas J. Condon, Jr.  Peterson Johnson and Murray Chicago LLC  200 W. Adams  Suite 2125  Chicago, IL 60606</p>
<p>PCB 2019-25  Amber M. Samuelson  Rosenthal, Murphey, Coblenz &amp; Donahue  30 North LaSalle St.  Suite 1624  Chicago, IL 60602</p>	<p>PCB 2019-26  John F. Donahue  Rosenthal, Murphey, Coblenz &amp; Donahue  30 North LaSalle St.  Suite 1624  Chicago, IL 60602</p>
<p>PCB 2019-27  Teresa Hoffman Liston  Village of Morton Grove  6101 Capulina Avenue  Morton Grove, IL 60053</p>	<p>PCB 2019-28  Matthew M. Welch  Montana and Welch LLC  11950 South Harlem Avenue  Suite 102  Palos Heights, IL 60463</p>
<p>PCB 2019-29  George F. Mahoney III  Mahoney, Silverman &amp; Cross, Ltd.  822 Infantry Drive  Suite 100  Joliet, IL 60435</p>	<p>PCB 2019-30  Benjamin L. Schuster  Holland &amp; Knight LLC  150 North Riverside Plaza  Suite 2700  Chicago, IL 60606</p>
<p>PCB 2019-31  Mark E. Burkland  Holland &amp; Knight LLC  150 North Riverside Plaza  Suite 2700  Chicago, IL 60606</p>	<p>PCB 2019-32  Michael P. Murphy  Heplerbroom, LLC  4340 Acer Grove Drive  Springfield, IL 62711</p>

PCB 2019-33 Marron Mahoney Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435	PCB 2019-34 Jeffrey M. Fronczak Cook County Department of Transportation and Highways 69 W. Washington Street 24th Floor Chicago, IL 60602
PCB 2019-35 D. Danielle Grecic Village of Niles 1000 Civic Center Drive Niles, IL 60714	PCB 2019-36 Brett D. Heinrich Dana B. Mehlman Vedder Price 222 North LaSalle Street Suite 2600 Chicago, IL 60601
PCB 2019-37 David J. Silverman Mahoney, Silverman & Cross, Ltd. 822 Infantry Drive Suite 100 Joliet, IL 60435	PCB 2019-38 Jared Policicchio City Of Chicago Department of Law 30 N. LaSalle Street Suite 1400 Chicago, IL 60602
PCB 2019-40 David B. Sosin Sosin Arnold and Schoenbeck Ltd. 9501 W. 144th Place Suite 205 Orland Park, IL 60462	PCB 2019-48 Edward J. Bailey Village of Riverside 3860 Columbus Boulevard Riverside, IL 60546
PCB 2019-48 Dennis G. Walsh Klein, Thorpe & Jenkins, Ltd. 20 N. Wacker Drive, Suite 1660 Chicago, IL 60606	