Chloride Pollutant Minimization Plan for the Village of Niles, Illinois

October 31, 2022

Prepared by the Village of Niles Public Works Department

Chicago Area Waterways
CHLORIDE WORKGROUP

The Village of Niles is a member of the Chicago Area Waterways Chloride Workgroup

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NILES
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1.0 Introduction to Chloride Issue in CAWS/LDPR

This Pollutant Minimization Plan (PMP) has been prepared by the Village of Niles to reduce the environmental impacts from the organization's chloride related operations. The Village of Niles is a discharger covered under the Time Limited Water Quality Standard for Chloride for the Chicago Area Waterways System and Lower Des Plaines River watersheds. This PMP has been prepared to meet the requirements laid out in the Time Limited Water Quality Standard (TLWQS) for Chloride. The term of this PMP covers the first 5-years of the TLWQS period and will be updated following the re-evaluations at Years 4 ½, 9 ½, and 14 ½.

Chloride is a permanent pollutant. It does not degrade over time and continues to accumulate in the environment. Proactive measures to reduce the amount of chloride discharged can help reduce the impacts from chloride on receiving waterways and the environment. Chloride impacts aquatic life, vegetation, and infrastructure. As the chloride concentrations increase and our waters become saltier, aquatic and plant biodiversity decreases and native species are overtaken by salt tolerant invasive species.

Chlorides are commonly found in road salt, fertilizers, water softeners, dust suppressants, and certain industrial processes. Chloride-based deicers, like rock salt, are used on parking lots, sidewalks, and roads to provide safe surfaces to the public during the winter months. These deicers are one of most common sources of chloride in the Chicago region.

The water quality standard for chloride for the Chicago Area Waterway System (CAWS) was updated as part of the rulemaking process related to changing the designated use of the CAWS. The chloride standard was updated from 1,500 mg/L during the winter and 500 mg/L during the summer to 500 mg/L all year round. The change in the chloride water quality standard took effect in 2018. Because portions of the CAWS were not going to meet this new standard due to the need to maintain public safety on roads, highways, sidewalks and parking lots during the winter months, a joint submittal and supporting individual petitions were submitted between 2015 and 2018 to the Illinois Pollution Control Board for a variance from the chloride standard. The joint petition laid out best management practices that can be achieved by the petitioners to reduce their chloride use while maintaining public safety during winter storms. In addition to the CAWS, portions of the Lower Des Plaines River watershed were included as it receives water from the CAWS.

On November 4, 2021, the IPCB issued an Opinion and Order for a Time Limited Water Quality Standard (TLWQS) for Chloride for portions of the CAWS and Lower Des Plains River watersheds. The TLWQS for Chloride watersheds are defined in the Opinion and Order as the Des Plaines River watershed from the Kankakee River to the Will County Line (except for the DuPage River watershed) and the CAWS watershed (except the North Branch Chicago River watershed upstream of the North Shore Channel and those portions of the watershed located in Indiana). This is a watershed-based approach to reduce the chloride concentrations in the CAWS and Lower Des Plaines River. The TLWQS for Chloride requires all dischargers covered under the TLWQS for Chloride to create PMPs and implement specific best management practices based on their operations to reduce their chloride discharges.

2.0 Organization Info, Facilities' Specific Info

2.1 Facility overviews/descriptions

Agency Name: Village of Niles		
Facility Name: Niles Public Works		Permit Number: ILG103
Facility Address: 6849 West Touhy Avenue		
City: Niles	State: Illinois	Zip Code: 60714

Incorporated in 1899, the Village of Niles, Illinois is approximately 15 miles from downtown Chicago and has grown from a population of 500 people in 1899, to 30,912 residents based on the 2020 census. The Niles Public Works Department is composed of an administrative staff and eight divisions, which are collectively responsible for delivering public services and maintaining the quality of life for the residents of the Village of Niles.

The divisions are Engineering, Facilities, Fleet, Free Bus, Forestry and Lights, Water and Sewer Distribution, Streets and Signs, and Water Plant. The Department's headquarters are located at 6849 W. Touhy Ave., Niles, Illinois and staffed with 55 full-time, 19 part-time and 8 winter seasonal employees, however only 26 full-time and 8 seasonal employees are available for snow and ice control. Engineering, Administrative and Free Bus staff (15 full-time and 18 part-time) do not assist in snow removal efforts. Fleet Maintenance (8 full-time and 1 part-time) employees serve in a support role. Facilities employees (6 full-time) are dedicated to snow removal at various facilities

The Village provides snow removal services to the following assets:

- 57.5 center line miles of Village streets, which requires 230 plowing miles to plow curb to curb.
- 6 miles of alleys
- 16 municipal parking and plaza areas including:
    - Village Hall
    - Police Department
    - Public Works Department
    - Fire Station 2
    - Fire Station 3
    - Senior Center
    - Family Fitness Center
    - Touhy Avenue Water Plant
    - Memorial Waterfall parking
    - 7649 Milwaukee Municipal Parking Lot
    - 7735 Milwaukee Municipal Parking Lot
    - Harlem Municipal Parking Lot
    - Leaning Tower
    - Albion Monument
    - Historical Society
    - Greenwood Recreation Area
    - 12 municipal bus shelters.

2.2 Chloride Sources

All road salt and liquid products are stored at the Niles Public Works facility at 6849 W. Touhy Avenue in Niles and are used for winter road, parking lot and sidewalk maintenance. This is a secured campus and requires programmed identification cards to access the site. Road salt is stored in a salt storage dome measuring 72 feet in diameter and 36.5 feet high, with a large entrance and reinforced wing walls that extend beyond the cone walls to prevent the elements from entering the building, as well as protect the canopy trusses. The salt storage dome has a stockpile capacity of 2,065 tons and is not allowed to exceed the rated capacity.

The dome was constructed on an impervious concrete foundation to prohibit groundwater leaching, and is elevated above the ground to prevent surface water from reaching the stockpile. The unobstructed interior space allows for easier loading, moving and rotation of stored materials. The salt storage dome and loading area must be kept clear of spilled material and no spilled salt is allowed to remain exposed to weather. Should spillage occur during loading of trucks, materials are collected and returned to the stockpile.

The Village has a total of six liquid storage tanks for salt prewetting and anti-icing materials. The liquid products used are an organic based, corrosion inhibited, liquid deicer containing a highly refined carbohydrate concentrate, two exothermic chlorides and two non-exothermic chlorides, and has passed the testing standards of the Pacific Northwest Snowfighters (PNS). It is listed on the PNS Qualified Products List, and also has been authorized to carry the USEPA *Designed for the Environment* label.

The Village has four 5,000 gallon tanks to store 20,000 gallons of liquid for salt prewetting, and one 5,000 gallon and one 8,000 gallon tanks for 13,000 gallons of a similar product for anti-icing, for a total liquid storage of 33,000 gallons of product. The products can be used interchangeably depending upon weather conditions, such as air or pavement temperature. Tanker loads of additional liquid products are ordered as needed during the winter to replenish supplies. To ensure no solids are present that could damage pumps, liquids are filtered by passing through a screen as they leave the tanker, as they enter the storage tank, and again when loaded into tailgate and anti-icing tanks. Liquids are also filtered while they are being recirculated.

2.3 Level of Service for Winter Maintenance Activities

The Public Works Department has developed a snow and ice control plan to be used as an operation guide during a “typical” and an extraordinary snow emergency to maintain the ability of traffic to utilize streets throughout the Village. The plan covers the two basic snow and ice control strategies:

- Anti-Icing – This is a proactive strategy for prevention of a strong bond between frozen precipitation or frost and a pavement surface by the timely application of a chemical freeze point depressant, usually liquids.
- Deicing – This is a reactive strategy where treatment of a deicer is applied to the top of an accumulation of snow, ice or frost that is already bonded to the pavement surface.

In 2009, the Village of Niles began its anti-icing program. While it was a relatively short time ago, anti-icing was still a newer method at the time. Therefore staff developed an Anti-icing Application Decision Flowchart in cooperation with McHenry County Department of Transportation to help guide supervisors through the decision making process. Over the years we have refined our process slightly, however it remains largely unchanged.

A main thrust the past several years was ensuring all salt was prewet prior to being spread, to increase effectiveness and reduce bounce and scatter. Additionally a greater understanding of pavement temperature as it relates to salt’s effectiveness has been emphasized time and time again. This emphasis, combined with anti-icing, calibration of equipment and route optimization has led to a 40% decrease of salt usage over comparable storms from previous years.

The Village of Niles snow and ice control plan is designed to provide coverage and response to events 24/7. Three road supervisors are assigned the duty of coordinating department snow and ice operations (Snow Commander) on a rotating weekly basis during the snow and ice season, from November to April.

Along with rotating Snow Commanders are two crews comprised of full-time employees which rotate on-call coverage each week. The weekly rotation of supervisors and crews keeps employees from burn out, and also provides a better plan for events outside of regular work hours for employees.

Should there be a snow event during regular work hours, the designated Snow Commander is responsible for coordinating department efforts, including the assignment of available employees and equipment. Should the event continue past regular work hours, the Snow Commander will assign members of the on-call group to remain at work. When a snow/ice event is forecast to begin during non-regular work hours, salt trucks and prewetting tanks are loaded prior to the end of the work day. The number of trucks loaded may vary based upon the anticipated severity of the event.

If the weather event will occur shortly after the end of the employee's regular shift, an adequate number of employees will stay at the end of their regular shift. Should the forecast anticipate the event occurring later, when possible the Snow Commander will schedule a return to work time in advance of the anticipated start time of the weather event. This helps keep crews ahead of the storm and allows them to rest and prepare for storms appropriately. One of the most important items in snow fighting is responding to the event in a timely manner, therefore we always err on the side of caution and make certain crews are available to respond.

For other events, an RWIS notification or the Shift Commander for the Police Department will contact the designated Snow Commander when parameters are met indicating weather conditions warrant response to an imminent or actual snow/ice event. Employees will then be contacted to report to work.

While weather conditions may warrant a full snow removal operation begin immediately, generally snow/ice events begin as a salting operation with eight to eleven pieces of equipment assigned to service the roads, in addition to a dedicated front-end loader operator and facility crews treating parking lots and pedestrian areas.

Crews are assigned to one of the following routes:

- Highway Routes A, B or C
- Subdivision Routes 1, 2, 3 or 4
- Factory Area
- Facilities

While each crew member will generally be assigned the same route each storm, because of the GPS navigation devices providing in cab turn-by-turn directions for each route, full-time and seasonal employees can be adjusted to complete any of the routes with little if any disruption to efficiency.

Should snow continue to fall and salting by itself is no longer effective, the Snow Commander will contact the Streets Superintendent who will mobilize the department for a snow removal operation. For snow removal operations, the Village divided into predefined routes, and the number of employees and equipment assigned to a snow removal operation vary depending upon the type and intensity of the storm into the following routes:

- Highway A Route
- Highway B Route

- Highway C Route
- Factory Route
- Black Route
- Blue Route
- Green Route
- Orange Route
- Purple Route
- Red Route
- Yellow Route
- Cul-De-Sac North Route
- Cul-De-Sac South Route

For normal snow removal efforts, the following is the priority of the roadway network.

Priority 1 - Arterial, major collector roadways and Snow and Bus Routes are addressed first.

- Arterials are major roadways with high traffic volumes and high operating speeds that provide critical access and links within the Village. Clearing these roads is a top priority to ensure safe access for emergency vehicles, provide adequate land width for traffic, and minimize surface re-icing.
- Major collector roadways distribute traffic between arterial roadways and residential streets and often serve as vital link between arterials and subdivisions.
- Snow and Bus Routes. These are the first roadways plowed within a local street area to provide safe passage for the bus roadway network.
- Parking lots of open Village facilities.

Because these are critical to the transportation and emergency needs of the Village, snow removal equipment will remain on these roadways until the snow storm dissipates.

Priority 2 - Local streets and cul-de-sacs

- Local streets and cul-de-sacs provide for low and moderate traffic volumes within subdivisions and provide direct access to residences or private property.

The plowing of local streets and cul-de-sacs is typically addressed after Priority 1 roadways have been cleared, however storm conditions often permit Priority 1 and Priority 2 streets to be serviced at the same time.

Priority 3 – Alleys and parking lots of closed Village facilities.

Priority 4 – On-street parking areas.

If a snow removal operation is anticipated to last an extended period of time, the workforce will be split into shifts, working twelve-hour work shifts. After the twelve-hour work period, employees must have at least eight hours of rest. Generally, if a shift works through the night, they will be sent home at 7:00 a.m., and the second shift will then work until 7:00 p.m. If the storm has continued, the first shift will return to work at 7:00 p.m. to continue snow removal operations.

In rare instances, when a single storm event with extreme blizzard type conditions, or when a series of severe snow storms occur in rapid succession prior to full recovery from the previous storm, it is anticipated the physical conditions caused by these natural events will exceed the capability of existing Public Works staff and equipment.

In such circumstances, the Streets Superintendent or Director of Public Works will activate the Emergency Snow Clearance Plan in concurrence with the Village Manager. Under this plan, snow plowing services shall first be concentrated on opening arterial, collector, significant roads, and bus and snow routes within the corporate limits. Snow removal equipment will be staffed around the clock by reassigning personnel to one of two twelve-hour shifts as provided above. During such emergency periods, the Department shall make provisions to meet basic nutritional needs of employees, and in extreme storms, housing needs. In extreme circumstances, contractual assistance may be necessary.

After a major event, crews will load and haul snow from areas with heavy pedestrian traffic, or where driver site lines need to be improved. The snow is hauled to a designated area, which when it melts, filters through a bioinfiltration facility to remove pollutants prior to discharge into the storm sewer. This is discussed further in the Environmental Section.

3.0 Chloride Monitoring Data

Chloride monitoring data will be collected for the CAWS and Lower Des Plaines River watersheds per the IPCB order. The data will be maintained by the workgroups. Chloride data for the CAWS will be collected by MWRD for the CAWS watershed and provided to the workgroups as part of the annual reporting as required by the IPCB order.

4.0 Chloride Reduction BMPs for POTWs, MS4s, CSOs, Industrial Sources, IDOT/Tollway

As part of the Chloride TLWQS, specific BMPs were identified for POTWs, MS4s, CSOs, Industrial Sources, and IDOT/Tollway to reduce the chloride impact on the watershed. These BMPs will be implemented over the 15-year term and additional BMPs evaluated at 5-year intervals during the 15-year term. Further details about winter maintenance practices currently being implemented by the Village of Niles are included in the Snow and Ice Guidelines which is attached.

The BMPs identified are outlined below:

Workgroup BMP

Variance BMP	Currently Implementing	Will Implement (Target Year)	Agency Description of Current Implementation
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.	**X**		The Village of Niles has been a member of the Chicago Area Waterways Chloride Workgroup since 2022, and have attended meetings, trainings, etc.

Salt Storage and Handling BMPs

Variance BMP	Currently Implementing	Will Implement (Target Year)	Agency Description of Current Implementation
Store all salt on an impermeable pad that must be constructed to ensure that minimal stormwater is coming into contact with salt unless the salt is stored in a container that ensures stormwater does not come into contact with the salt.	**X**		The Village of Niles stores salt in one storage dome that can hold 2,065 tons of rock salt. See Snow and Ice Guidelines, Section 3.
Cover salt piles at all times except when in active use, unless stored indoors.	**X**		The Village of Niles stores salt in one storage dome that can hold 2,065 tons of rock salt. See Snow and Ice Guidelines, Section 3.
For working areas, provide berms and or sufficient slope to allow snow melt and stormwater to drain away from the area. If snow melt and stormwater cannot be drained away from the working area, channeling water to a collection point such as a sump, holding tank or lined basin for collection, discharge at a later time, use for prewetting, and use for make-up water for brine must be considered.		**2026**	The Village of Niles is in the process of redesigning the Public Works campus to provide new storage areas as well as a larger salt dome and liquid storage areas. As part of the redesign, a loading area with a central collection tank/basin for liquids is being planned. These liquids collected will be used for prewetting salt or anti-icing.
MS4/CSO Only - Use deicing material storage structures for all communities covered under General Permit ILR40 for MS4 communities.	**X**		The Village of Niles stores salt in one storage dome that can hold 2,065 tons of rock salt (Snow and Ice Guidelines, Section 3).
Good housekeeping practices must be implemented at the site, including: • cleanup of salt at the end of each day or conclusion of a storm event; • tarping of trucks for transportation of bulk chloride; • maintaining the pad and equipment; • good practices during loading and unloading; • cleanup of loading and spreading equipment after each snow/ice event;	**X**		The Village of Niles uses good housekeeping practices for winter road salt related work including loading, salt deliveries, and facility inspections. Details are provided in the Snow and Ice Guidelines, Section 3 and Attachment 2.

• a written inspection program for storage facility, structures and work area; • removing surplus materials from the site when winter activity finished where applicable; • annual inspection and repairs completed when practical; • evaluate the opportunity to reduce or reuse the wash water.			

Winter Maintenance Operations BMPs

Variance BMP	Currently Implementing	Will Implement (Target Year)	Agency Description of Current Implementation
Calibrate all salt spreading equipment at least annually before November 30th. Records of the calibration results must be maintained for each piece of spreading equipment.	**X**		Calibration is completed by staff of the Village of Niles each year. Details are included in Section 4 of the Snow and Ice Guidelines.
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.	**X**		The Village of Niles uses pre-wet road salt on all trucks and all future trucks purchased will have this system installed. Further information regarding pre-wetting is available in Section 7 of the Snow and Ice Guidelines.
Use equipment to measure the pavement temperature unless such equipment has already been installed on road salt spreading vehicles.	**X**		The Village of Niles monitors pavement temperatures using two fixed RWIS units, and is installed three portable sensors mounted on Supervisors' and administrators' vehicles. See Section 4 of the Snow and Ice Guidelines.
Develop and implement a protocol to vary the salt application rate based on pavement temperature, existing weather conditions, and forecasted weather conditions.	**X**		The Village of Niles varies application rates and materials based on pavement temperatures and weather conditions. Information regarding application rates and materials is included in Section 7 of the Snow and Ice Guidelines.
Track and record salt quantity used and storm conditions from each call-out.	**X**		The Village of Niles maintains records of each winter storm call-out. Information regarding recordkeeping is included in Attachment C of the Snow and Ice Guidelines.
Develop a written plan 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.	**X**		The Village of Niles uses Anti-Icing as part of its winter operations. Information about the Anti-Icing program is outlined in Section 6 of the Snow and Ice Guidelines.
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.	**X**		The Village of Niles completes annual training for winter maintenance staff each year. Training topics and procedures are outlined in Section 5 of the Snow and Ice Guidelines. Additionally, supplemental training is obtained via attendance at local and national winter maintenance seminars and workshops.

Be responsible for complying with all applicable BMPs even when deicing practices are contracted out and ensure that contractors are property trained and comply with all applicable BMPs.	**N/A**		The Village does not contract out winter maintenance responsibilities at this time.
Complete an annual report, as required by paragraph 3(B) of this order, which is standardized in an electronic format and submitted to the IEPA's website and to the watershed group.		Will complete first report in 2023.	The Village of Niles will complete and submit an annual report each year to IEPA and the workgroup by July 1.
Obtain and put into place equipment necessary to implement 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.	**X**		The Village of Niles currently has all equipment necessary to implement all salt spreading/deicing measures specified in the BMP. See Section 4 of the Snow and Ice Guidelines.
MS4/CSO/IDOT/TOLLWAY Only - 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.	**X**		The Village of Niles monitors pavement temperatures using two fixed RWIS units, and is installed three portable sensors mounted on Supervisors' and administrators' vehicles. See Section 4 of the Snow and Ice Guidelines.
MS4/CSO/IDOT/TOLLWAY Only - 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.	**X**	Will complete in 2023.	The Village of Niles currently reviews and updates it plan on an annual basis. See Section 1 of the Snow and Ice Guidelines. The review will be updated to incorporate an evaluation of each salt spreader's application rate, variations in application rates, and discussion of the variation compared to the recommended rates.

Additional BMPs Identified for Agency/Facility

If your agency currently does any other BMPs for chlorides specific to your operations (for industrial members – this may include any BMPs related to chlorides in your processes), list them out in the table below and provide details about how you are currently implementing those BMPs. If you don't use any additional BMPs, feel free to delete this section.

BMP	Currently Implementing	Agency Description of Current Implementation
Route Optimization	**X**	The Village optimized plowing and salting routes to reduce travel time, distance travelled and provide a more even distribution of the workload. These changes would also lead to decreasing the amount of deicing products used. Public Works staff worked with a software company to develop optimized routes. Some of the other items addressed in this optimization were: Minimizing left turns and U-turns; Minimizing crossing major routes at uncontrolled intersections; Completion of the routes within time goals; Prioritize routes based upon roadway priority, and Modifying routes based upon real world realities.
GPS Navigation Devices	**X**	
Automated Vehicle Location Equipment		Automated Vehicle Location equipment is installed on all Village plow trucks, giving us the ability to use technology to balance road salt usage as wells as levels of service. Supervisors can get real-time data, replay of truck route and detailed after action reports for a number of activities including: Solid and Liquid Material Rates/Used, Plow Up/Down, Spreader On/Off and Driver Behavior

5.0 Plan to Implement BMPs

The Village of Niles will implement the following BMPs to take steps towards compliance with chloride standards for the watershed.

BMP: Salt Storage and Handling BMPs

For working areas, provide berms and or sufficient slope to allow snow melt and stormwater to drain away from the area. If snow melt and stormwater cannot be drained away from the working area, channeling water to a collection point such as a sump, holding tank or lined basin for collection, discharge at a later time, use for prewetting, and use for make-up water for brine must be considered.

Plan to Implement BMP: The Village of Niles is in the process of redesigning the Public Works campus to provide new storage areas as well as a larger salt dome and liquid storage areas. As part of the redesign, a loading area with a central collection tank/basin for liquids is being planned. These liquids collected will be used for prewetting salt or anti-icing.

Schedule for Implementation: 2026

6.0 Other Chloride TLWQS Required Milestones

The Village of Niles will implement these specific milestones (not included in the above BMPs) as outlined by the Chloride TLWQS.

Milestone	Agency Completion Date	Agency Completion Details
6 MONTHS AFTER EFFECTIVE DATE: Petitioner establishes a mechanism for tracking of de-icing salt usage for each facility.	Completed	The Village of Niles utilizes a loader scale to weigh the amount of salt loaded and unloaded from trucks to provide an accurate record of tracking salt usage. See Section 3 of the Snow and Ice Guidelines.
July 1st OF EVERY YEAR (BEGINNING WITH YEAR 2): Discharger must submit an Annual Report for the previous year beginning on May 1 and ending on April 30 of the following year to the Agency and the chlorides workgroup on. The report shall be on salt usage for deicing and steps taken to minimize salt use and makes the report publicly available.	By July 1 of each year, beginning in Year 2	The Village of Niles will submit an annual report to the workgroup and IEPA.
July 1st of YEAR 3, YEAR 8 and YEAR 13: The chlorides workgroup submits a Status Report to the IEPA which includes an analysis on the following: chlorides monitoring data; report on the chloride workgroup's outreach strategy, which includes outreach efforts to expand coverage of the TLWQS, and outreach and training for nonpoint sources; identification of any new BMPs, treatment technology or salt alternatives; identification of the impediments and potential solutions of those impediments faced by dischargers and those granted coverage under the TLWQS that prevent them from completing the training and making all capital purchases necessary to implement the required BMPs; and identification and description of any assistance (financial, technical, or otherwise) that the chloride workgroup may be able to provide.	By July 1 of year 3, the workgroups will submit a Status Report to the IEPA.	The Village of Niles will submit an annual report to the workgroup and IEPA.
July 1st OF YEAR 4 ½: Chlorides workgroup submits to the Board its first proposed re-evaluation pleading consistent with the Board's order granting the TLWQS.	By November 12, 2026, the workgroups will submit a re-evaluation to the IEPA and IPCB.	

Appendix 1 – The Village of Niles Snow and Ice Guidelines are attached.