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CONTINUING PLANNING PROCESS

Introduction and Purpose

The Federal Water Pollution Control Act Amendments (FWPCA) of 1972 established a series of related programs for setting water quality standards, constructing municipal wastewater treatment plants, issuing permits for wastewater discharges, enforcing discharge permit conditions and establishing a broadly based planning process for water quality management (WQM). The WQM program is oriented towards implementation of abatement strategies for the control of point and nonpoint sources of pollution. Subsequent modifications to the FWPCA embodied in the Clean Water Act (CWA) of 1977 (PL 95-217) and several court decisions have further underscored the importance of the planning process to overall WQM program objectives.

The on-going planning requirements for the WQM program are described in Section 303(e) of the CWA. This section requires the State to develop a "Continuing Planning Process" (CPP) which describes the operational policies, procedures and practices of the WQM program.

Authority and Applicability

The WQM program authority is provided for by Sections 106, 208 and 303 of the CWA. The CPP is required by Section 303(e) and described in 40 CFR Part 130.5 of the July 1, 1992 Federal Register. The Illinois Environmental Protection Act of 1970, as amended, provides the framework for the development of the CPP within the State program structure. Section 4(m) of the Act authorizes the Illinois Environmental Protection Agency to undertake all responsibilities outlined in Section 303 on behalf of the State. This includes the development and maintenance of the CPP. Illinois first received approval of its CPP on September 17, 1975. This CPP incorporates all substantive policy and procedural matters relating to the State Environmental Protection Act of 1970 as amended, rules and regulations promulgated thereunder, and other formal program documents.

CPP Framework

The purpose of the CPP is to define an operating management framework to target resources toward achievement of water quality management objectives. The process provides a framework for the following:

1. Continuity between the annual program plan and longer term direction.
2. Transition between program base elements and new initiatives.
3. Intermedia program interface.
4. Mechanisms to identify and assess conflict resolution needs.
5. Local, State and Federal coordination.

Distinct relationships exist between the activities conducted in the regulatory water pollution control program and the water quality management program. If WQM programs are to function properly they must interact with each other. The CPP is the mechanism for providing coordination between water program functions. These program functions include: water quality monitoring, water quality standards development, permitting, construction and grant management, and water quality management planning. It also includes the development of a compliance monitoring strategy, and enforcement management.

THE STATE PROGRAM

As stated previously, the basic framework for the water pollution control activities of Illinois State government is established by the Environmental Protection Act of 1970, as amended (EP Act). This statute lays out the fundamental authorities and responsibilities of the three state agencies most directly responsible for water pollution control in Illinois. It is the express purpose of the EP Act "to establish a unified statewide program, supplemented by private remedies, to restore, protect, and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them".

Illinois Pollution Control Board

The Pollution Control Board, consisting of seven full-time members appointed to three-year terms by the Governor, establishes regulations (including water quality standards), acts as the court of original jurisdiction in the enforcement of the EP Act and Board Regulations, and grants variances of limited duration from provisions of the EP Act or regulations when justified.

The regulations adopted by the Board set forth the primary requirements to be met in achieving the state's environmental objectives. Careful review of these regulations, particularly "Title 35: Subtitle A: Procedural Rules" and "Title 35: Subtitle C: Water Pollution", is necessary in order to fully understand the state's water pollution control program. Those chapters of the Pollution Control Board regulations which are most directly related to water quality management are an integral part of this Continuing Planning Process, and are found in these regulations.

"Title 35: Subtitle C: Water Pollution" sets forth a comprehensive regulatory foundation for achievement of the state's water quality objectives. It establishes water quality standards for various categories of stream use; it designates water uses for all waters of the state; it defines effluent standards which represent a uniform minimum level of effluent quality which must be achieved irrespective of water quality effects, along with schedules for compliance; it sets forth monitoring and reporting requirements and certain basic design criteria for facilities which have the potential to cause water pollution; it prohibits the discharge of wastes from watercraft; it establishes requirements for various categories of permits, including those for construction of treatment facilities and for state-issued NPDES permits; and it provides a requirement for state certified wastewater treatment operators for every treatment facility in Illinois.

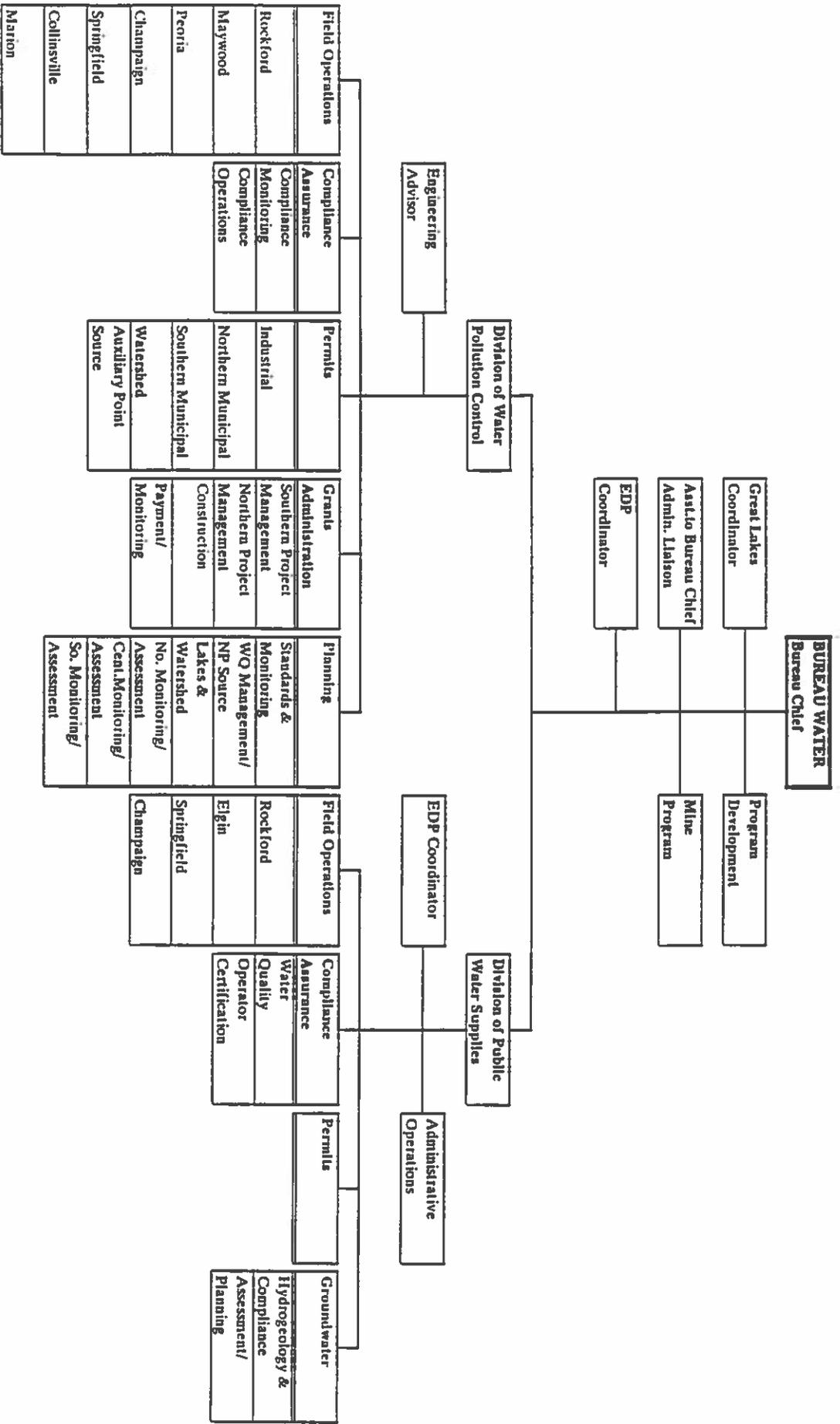
An important feature of Illinois' environmental laws is the variance provision. Upon a formal demonstration of arbitrary or unreasonable hardship, the Pollution Control Board may grant a temporary variance from the limitations of the Environmental Protection Act or Board regulations. Reporting requirements and compliance schedules are frequently made conditions of a variance. The Board may not grant a variance in conflict with federal law (35 Ill. Adm. Code, Subtitle A, Ch. 1, Section 104.122(b)).

All Board actions on variance petitions, enforcement matters, regulatory matters and permit denial appeals are subject to public participation in Board hearings and meetings. Full public access and the ability to have input into the decision-making process is required by the EP Act. Additionally, Board actions are periodically announced in the Environmental Register. This focus on public participation is an integral component of the states efforts to maintain active citizen participation in the overall Water Quality Management Program.

Illinois Environmental Protection Agency

The Environmental Protection Act creates the Illinois Environmental Protection Agency (IEPA) as the enforcement and service arm of the state's environmental program (see Figure 1). In this role, IEPA is responsible for implementation of the regulations set by the Board, and functions as the state water pollution control agency for the purposes of the CWA (as amended). The Agency conducts or coordinates the various planning programs called for by the Federal Water Pollution Control Act; it administers the federal municipal sewage treatment facilities construction grant program under Title II, Revolving Loan Program under Title VI, and a parallel state grant program; it issues permits for the construction and operation of wastewater sources and treatment facilities; it conducts a comprehensive program of surveillance and monitoring of both discharges and ambient water quality; it assists in training wastewater treatment operators and certifies those operators according to the Board regulations; it investigates violations of the EP Act and regulations and takes appropriate enforcement actions, including referral to the Attorney General or USEPA when voluntary compliance does not occur; it reviews Board standards and regulations and recommends appropriate amendments when needed; and it performs numerous other related functions as a part of the overall water pollution control program. A detailed description of the Agency's water pollution control activities for a given year can be found in the State's Annual Program Plan.

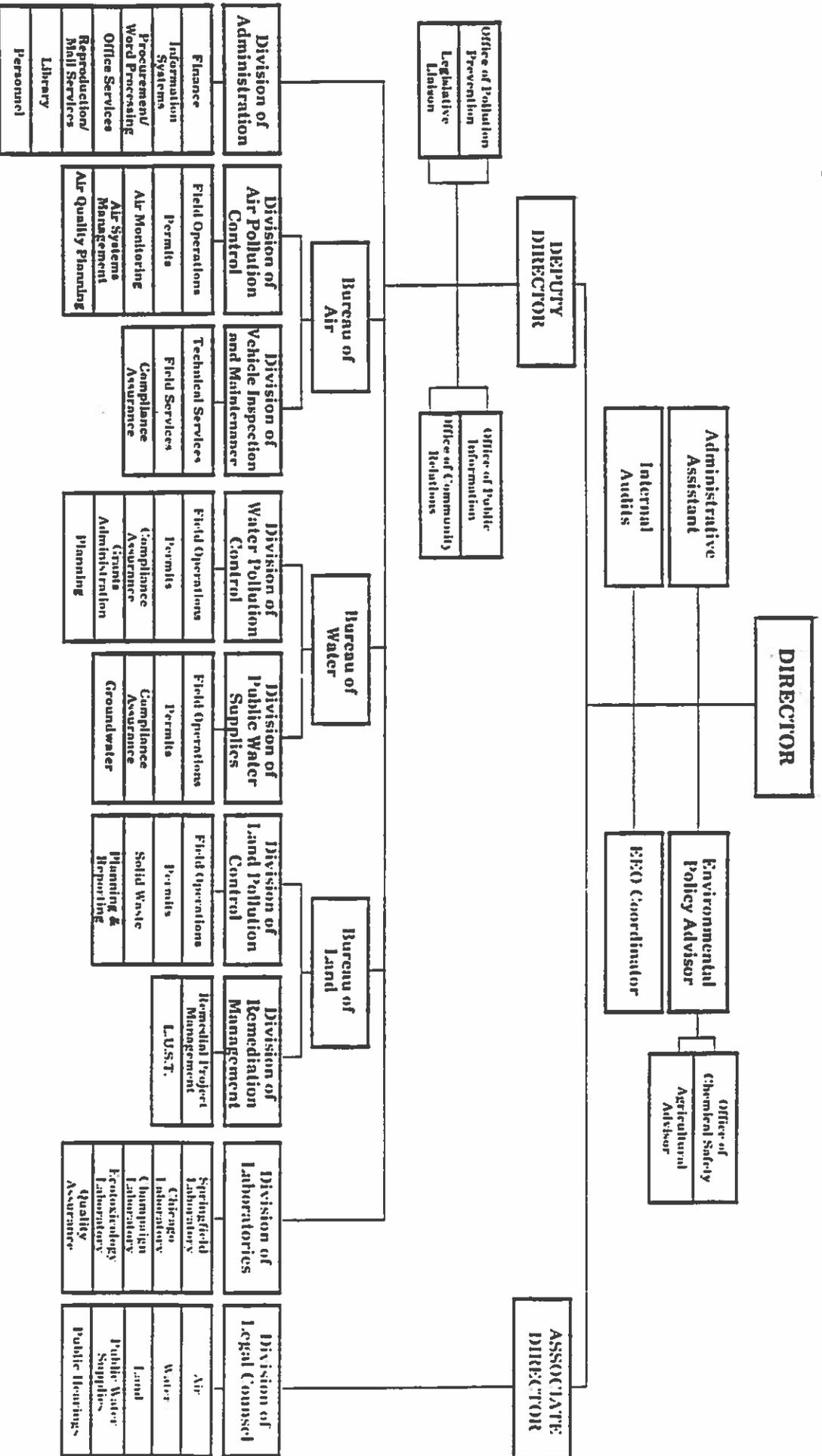
ORGANIZATIONAL CHART
 ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
 BUREAU OF WATER
 December, 1993





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
September 1993

ORGANIZATIONAL CHART



Illinois Department of Energy and Natural Resources

The EP Act established the Department as the research and education arm of the state's environmental protection apparatus. It has also provided the administrative structure for state-sponsored applied research and demonstration projects in many areas of concern to the water pollution control effort. Considerable effort is devoted to making the projects undertaken by the Department reflective of the concerns of the Agency and the Board.

The Department utilizes several of its branch Divisions (Water Survey, Natural History Survey, Geological Survey) to comply with these responsibilities as well as other tasks described in the EP Act.

IEPA – DIVISION OF WATER POLLUTION CONTROL

As previously indicated, the IEPA through the Division of Water Pollution Control (Division) is the state water pollution control agency for the purposes of the CWA. It is important therefore to understand the structure of the Division, and its interaction within itself and with other Divisions in the execution of CWA activities (See Figure 2). Sections within the Division include: Permits, Planning, Grants Administration, Field Operations, Compliance Assurance, and the Mines Program Unit. The following describes the activities of these Sections and their integrated roles in administering the CWA.

PERMITS

In all areas except pretreatment, the State of Illinois has been delegated National Pollutant Discharge Elimination System (NPDES) permitting authority pursuant to Sections 402 and 303(e) of the CWA, and has the responsibility for issuance, reissuance, modification and enforcement of NPDES Permits.

On-Going Permit Activities

The procedures for the issuance of permits are established by a memorandum of agreement with the USEPA; the regulations under 40 CFR 122, 123, 124 and 125; and the Illinois Administrative Code, Title 35, Environmental Protection. The priorities for permit issuance are established based on guidance from USEPA; discussions with Region V, USEPA; and the needs of the Agency in implementing the construction grants/loans program within the context of Annual Program Plan commitments.

Pretreatment

Cooperative program implementation efforts between Region V, USEPA and IEPA serve to enhance the ultimate management of the pretreatment program. Under the agreement of the program plan, the Illinois EPA carries out the following pretreatment functions:

1. Reviews the annual reports submitted by Publicly-Owned Treatment Works (POTW).
2. Conducts pretreatment audits/compliance inspection as agreed to in the annual program plan commitments.

Coordination of industrial pretreatment programs with municipal permits assures consistency between the two programs and helps eliminate the potential for industrial discharge of elements which could contaminate the municipal treatment process.

Sludge Management

The Division of Water Pollution Control (Division) regulates the disposal of sludge for sludge generators, where sludge is utilized for beneficial purposes. This includes application of sludge on agricultural lands, reclamation projects, dedicated land disposal, horticultural use, or any other beneficial use of sludge on land. Sludge disposal by

landfilling is regulated by the Division of Land Pollution Control while incineration of sludge is regulated by the Division of Air Pollution Control.

The Division reviews sludge management plans for sludge generators and utilizes the State permit program as the mechanism for approving and enforcing sludge management plans. The program also provides for separate permitting of individual disposal sites when warranted, and large users of sludge based on the amount of sludge utilized and on the acreage used for sludge application.

The Agency is working closely with USEPA on the 40 CFR 503 sludge regulations by monitoring the effect of these regulations and will determine if the Agency will seek delegation of the Federal Sludge Program.

Regulations pertaining to sludge management are contained in Ill. Adm. Code, Title 35: Subtitle C: Chapter II: Part 309. These regulations provide:

- Authority to the Agency to regulate the sludge management programs through the NPDES permit conditions;
- A State permit program which will require permits for all sludge generators and large users.

This regulation also provided a means by which the Agency could adopt technical and administrative criteria for municipal sludge application on land. These design criteria became effective December 14, 1983. The amendments and design criteria provide the Division with the necessary authority to regulate sludge management programs along with future regulations pursuant to Section 405 of the Clean Water Act.

This program allows the Agency to actively encourage the recycling of POTW generated sludges and other suitable sludges from industry to cropland. The permit system provides the controls necessary to insure sound environmental practices.

In addition to reviewing sludge disposal from the perspective of the Division of Water Pollution Control, the Division coordinates its review with other divisions and agencies when sludge disposal is practiced under methods such as landfilling, as a soil reclamation agent, or incineration. This review insures sound environmental practices from generation to final disposal.

Coordinated Review of Major New Facilities

The development of major new facilities requires special attention to ensure that adequate environmental controls are included. Attention is given to ensure that the controls for air pollution control, effluent quality and solid or hazardous wastes disposal are compatible with one another and are developed in a coordinated fashion. To this end the Agency has the Coordinated Review of Permit Applications (CROPA) which creates a single coordinated environmental control program for these facilities.

Dredge and Fill

The Division must provide water quality certification under Section 401 of the Clean Water Act for permits required by Section 404 of the same Act. There has been a continuance of the necessary coordination required for these projects involving the U.S. Army Corps of Engineers, Illinois Department of Transportation, Illinois Department of Conservation, U.S. Fish & Wildlife Service, USEPA, and this Agency. This coordination continues through the use of the Joint Application Form entitled "Protecting Illinois Waters."

The thrust of this coordination is to facilitate the receipt of information simultaneously by all of the reviewing agencies and to streamline the permit process through necessary communications and joint field visits as needed. The Agency places a concerted effort into the review of dredge and fill projects under Section 404, along with other waterway related projects under Section 10 of the 1899 Rivers and Harbors Act to assure that such projects do not violate any applicable State water quality regulations, and that the projects provide the best protection of water quality available within economic and engineering reasonableness. The review also includes advising applicants that their proposed project may also require an Agency permit (i.e. water main or sanitary sewer construction, conveyor system for loading dock, mining permit, etc.).

Storm Water Permits

IEPA has issued two general permits for storm water; one for industrial activity and one for construction site runoff. These permits were issued on October 16 and 20, 1992, respectively. Both of these permits established management procedures and required the development of a site-specific storm water pollution prevention plans. The storm water pollution prevention plans are the application of best management practices to reduce the contamination of storm water as it traverses a construction site or industrial site.

Agriculture Related Permits

IEPA issues permits jointly with the Illinois Department of Agriculture for agricultural facilities.

IEPA also issues permits for livestock operations. Starting in the fall of 1993, IEPA started issuing a general NPDES permit to livestock operations.

PLANNING

Water Quality Management Planning

The focus of water quality management planning activities is to provide a link between problem assessment and implementation action. A balanced approach among various institutional and technical program objectives is required to provide this linkage. The objective of these activities is to help direct ongoing program activities to achieve water quality integrity consistent with the mission of the Agency. It is a support oriented

program which is directed towards divisional needs related to nonpoint sources and resource related issues (lake management, water quality, etc.) as well as more traditional point source related functions.

The overall planning process has supported the acquisition and refinement of base information, initiation of problem assessments, input into implementation strategy development and the design of technical transfer programs. These efforts are made in order to further address the major point and nonpoint source pollution problems in the state. In addition, emphasis is being placed on addressing problems on a regional and local basis and providing adequate support to facilitate problem resolution.

The planning support function continues the implementation of Illinois Water Quality Management Plan policies and maintenance of its informational decision-making bases. This activity is also supplemented by Federal funding under the Clean Water Act for areawide water quality management planning and agricultural nonpoint source control.

The Agency has invested considerable time and staff resources on nonpoint source pollution issues, particularly in the area of agriculturally induced soil erosion and sedimentation in streams and lakes. Emphasis has also been placed on other important nonpoint source contributions such as urban runoff, construction erosion and hydrographic modification. Program planning and evaluation activities focus attention on urban sources, hydrographic modification activities and, in the agricultural areas, on pesticide and livestock waste issues.

With regard to point sources, conflict resolution and conformity determinations in support of divisional construction grant, revolving loans, and/or NPDES decisions has in part been provided through the maintenance of an areawide water quality management planning structure. The three originally designated planning agencies continue to be involved in the water quality management planning process. Their roles and responsibilities are outlined in the Illinois WQM Plan and further detailed in annual contractual agreements between the respective agencies.

In a similar fashion, the Agency maintains a working contractual relationship with the Association of Illinois Soil and Water Conservation Districts (AISWCD). The nature of the work which is undertaken by the AISWCD is directly related to the policies and objectives outlined in the agricultural portion of the Illinois WQM Plan. This contractual relationship targets traditional agricultural resources toward priority watersheds and water resources to minimize agricultural nonpoint source impacts.

Status of Water Quality Management Plan Implementation

During late 1982 through early 1983, the Agency worked with other state, regional and local agencies and interested individuals to consolidate and standardize a water quality management plan for the State of Illinois.

The consolidation effort refined and reiterated the implementation of the Plan's original goals and objectives. Moreover, it provided an opportunity to incorporate new and/or established techniques and methods which had been developed or adapted to further the process of implementation. Current implementation efforts broaden the involvement of

those agencies at both the State and local level, with water management responsibilities. They reflect the trends that have developed during the years since initial plan completion which have moved from a more traditional water pollution control program to a more broadly based water resource management orientation. The nature of these activities are described below.

Agriculture - The Agency maintains an agreement with the Illinois Department of Agriculture (IDOA) for the implementation of agricultural nonpoint source pollution control objectives as outlined in the Illinois Water Quality Management Plan. This includes participation in the Watershed Priority Advisory Committee. The Agency has also strengthened its working relationships with the Soil Conservation Service (SCS) and the Agriculture Stabilization and Conservation Service (ASCS). The Agency provides input to SCS as it develops its hydrologic unit concept for planning and management. Similarly, the Agency provides ASCS with water quality evaluations for watershed projects submitted for consideration under ACP Special Projects funding.

Lakes - The Agency's lake classification system is maintained and updated as necessary. Special efforts have been undertaken to develop and implement lake watershed protection/management plans for lakes which ranked high in the classification and have demonstrated local interest and resource commitment. In addition to lake assessment work performed by the Agency's Ambient Monitoring Unit, a volunteer program has been developed in Illinois. This program was implemented since 1981. This program annually utilizes approximately 225 trained volunteers who monitor 150-160 lakes. Clean Lakes, Zebra Mussel, and Lake Water Quality Assessment monitoring programs, in part supported through federal funding, also generate data that provide the basis for an operational technical assistance program to encourage local implementation of lake and lake watershed protection/management plans.

Urban Storm Runoff - The Agency, through the promotion of guidance documents and workshops sponsored through Areawide Commissions and the AISWCD's, emphasize local ordinance initiative for the control of urban storm water. Activities related to these initiatives are reflected in the yearly contract with the Regional Planning Commissions and AISWCD's.

Construction Site Erosion Control - The Agency provides technical support towards attainment of construction site erosion control through the Areawide WQM Planning Activities and the promotion of local ordinances requiring construction permit applicants to include consideration of construction erosion control measures.

Point Sources - The consolidation of State and Areawide WQM Plans into the Illinois Water Quality Management Plan established a clear process for consistency determination of various Division activities and the Illinois WQM Plan. The Illinois WQM Plan is the framework that links the NPDES permit program, construction grants program and the water quality management planning process. An inventory of all point source discharges and their location by latitude and longitude is maintained by the Planning Section. Efforts continue to keep Facility Planning area (FPA) maps current. The Areawide Planning Commissions, working with Agency

field staff, Planning staff, and Grant Administration staff, continue to review existing maps for accuracy, and make revisions based on requests by designated management authorities and approved by the Agency. All changes must be consistent with the consolidated Water Quality Management Plan. (Reference "WQM Plan Maintenance and Revision" for discussion of changes to FPA's).

Nonpoint Source Management Program

Nonpoint sources (NPS) pollution is the diffuse, intermittent runoff of pollutants from various sources. Precipitation moving over and through the ground picks up pollutants from activities such as agriculture and construction and carries them into rivers, lakes and groundwater.

As reauthorized on February 4, 1987, the Water Quality Act of 1987 (better known as the Clean Water Act) included a new federal initiative designed to help states cultivate innovative nonpoint source (NPS) pollution control strategies. Section 319 of the Clean Water Act (CWA) was developed to focus on the importance of controlling nonpoint sources of pollution.

Section 319 required that the State Water Quality Management Planning Agency, in cooperation with others, develop two reports; a State Assessment report, and a State Management Program report. The State Assessment report, entitled "Assessment of Nonpoint Source Impacts on Illinois Water Resources," (Assessment) was developed to identify where and what type of NPS pollution is impairing designated uses of Illinois' lakes, rivers, and groundwater resources, as well as to describe statewide program efforts towards the reduction of NPS pollution. To remain current, this information is updated and incorporated into the biennial Illinois Water Quality Report (305(b)).

As shown in the Assessment, the majority of Illinois' NPS problems continue to be caused by agriculture, urban runoff, hydrologic modifications, and resource extraction activities. Other sources include construction, land disposal, and in-place contaminants. Silvicultural and fruit production practices in the State, were not identified as causing major NPS impacts on water quality. Policies and recommendations in the WQMP will continue to guide the reduction of pollutants from these two sources.

The Illinois Nonpoint Source Management Program (Program) was developed to provide an overview of program initiatives that will be utilized to address water resource problems as identified in the Assessment. The Program supplements the Illinois Water Quality Management Plan, which included the initial program material from which the Program was developed. The purpose of this Program is to address these new initiatives and the informational requirements of Section 319 of the Clean Water Act, and to provide guidance in the management of NPS water resource problems in Illinois. The requirements of Section 319 include:

1. Identification of best management practices (BMPs) and measures which will be used to reduce pollutant loads upon the State's surface and groundwater resources;
2. Identification of programs to achieve implementation of BMPs;

3. Identification of goals to guide the implementation of BMPs and NPS control programs;
4. Certification that the laws of the State of Illinois provide adequate authority to implement this NPS management program;
5. Identification of financial assistance programs which will support the implementation of BMPs and NPS control programs; and
6. Identification of federal assistance programs and development projects the State will review for their effect on water quality.

The primary objective for the Program will be to continue the reduction of NPS pollution in Illinois so that the attainment of WQMP policies and recommendations can be realized. Primary goals established to reach this objective include:

1. Expand, update and/or create State implementation and research programs within current budgetary constraints which will better serve to protect the State's water resources from NPS pollution (i.e., to reduce the number of lake acres and stream miles having use impairments caused by NPS pollution);
2. Continue the statewide mechanism and process which enables state agencies and organizations, as a collective group, to equitably prioritize NPS pollution control projects for funding which may become available from local, state, and/or federal sources;
3. Continue the incorporation of "improved water quality" as a priority objective in all NPS pollution reduction programs; and
4. Increase the public's awareness and involvement in local NPS initiatives to serve as a catalyst for state and federal involvement at the local level.

Under Section 319 of the CWA, those states with approved NPS management reports are eligible to receive federal funds to implement or supplement ongoing nonpoint source initiatives. Illinois has been very successful in receiving funding under this program.

Numerous demonstration projects in rural and urban settings have been implemented throughout the State, along with the implementation of enhanced education and information efforts through various media.

Monitoring and Assessment

The Monitoring and Assessment Units operate a surface water monitoring program which provides necessary technical environmental information to meet water quality management needs and objectives. Individual monitoring projects and cooperating agencies are identified below. A more detailed discussion of these programs can be found in the States 305(b) Report.

- Ambient Water Quality Monitoring Network (AWQMN)

- Pesticide Monitoring Subnetwork (of AWQMN)
- Industrial Solvents Subnetwork (of AWQMN)
- Fish Contaminant Monitoring Network -- Illinois Department of Conservation, Illinois Department of Public Health, Illinois Department of Agriculture
- Facility-Related Stream Surveys
- Special Surveys
- Intensive River Basin Surveys -- Illinois Department of Conservation
- Biological Stream Characterization (BSC) -- Illinois Department of Conservation
- Ambient Lakes Program

The cooperative efforts of Monitoring and Assessment Units facilitate the dissemination of data to both state and federal agencies, as well as being utilized by Agency staff.

Standards and Monitoring Support

Section 4 of the Illinois Environmental Protection Act (EP Act), designated the Agency as water pollution agency for the State for all purposes of the Federal Water Pollution Control Act Amendments of 1972, Public Law 92-500. The Agency is directed to take all actions necessary or appropriate to secure to the State the benefits of such federal Acts provided the Agency transmits to the Federal Agency any standards adopted by the Pollution Control Board (Board) pursuant to Section 5(c) of the EP Act. Section 5(c) states:

"The Board shall have authority to act for the State in regard to adoption of standards for submission to the United States under any federal law respecting environmental protection. Such standards shall be adopted in accordance with Title VII of the EP Act..."

Section 303 of the Clean Water Act established provisions for acceptance or revision of existing state standards, and for incorporation of new standards. The State has established a formal process for the development, submittal and review of standards and rule changes.

Section 13 of the EP Act provides the Board with authority to adopt regulations including among other things, the establishment of "water quality standards specifying the maximum short-term and long-term concentrations of various contaminants in the waters..."

Pursuant to Section 4(f) of the EP Act, the Agency is mandated to participate in variance proceedings under Title IX, permit appeals under Section 40, and hearings to determine the validity or application of a rule or regulation under Sections 29 and 41. The Agency is specifically authorized by Section 4(i) "to make recommendations to the Board for the adoption of regulations under Title VII of the EP Act." Furthermore, the Agency is authorized by Section 28 of the EP Act to propose the adoption, amendment or repeal of Board regulations.

The Board's Procedural Rules concerning regulatory proceedings are found in 35 Ill. Adm. Code Part 102. If a proposal is accepted for hearing, a minimum of twenty (20) days of advance notice of the hearing date is required to ensure public comment. The Board is also required to make available copies of the proposal along with the summary statements of the reasons supporting its adoption.

Surface water quality standards development activities within the Agency are closely aligned with stream and lake monitoring and assessment functions. The organizational structure of the Division of Water Pollution Control accommodates the natural interdependency of these program elements by collectively housing these activities within the Planning Section. This assures close interaction of staff members assessing environmental conditions and those coordinating regulatory initiatives.

Illinois statutes provide for two (2) distinct categories of regulation; those of a statewide, regional, or general applicability, and those that are site, source or issue specific. Most "site-specific" proposals are initiated by individual members of the regulated public that for some reason contend that a generally applicable rule is inappropriate for their facility. Typically, the Agency's role in this type of regulatory proceeding is not one of a proponent, but rather an active participant in the public hearing phase. The Agency assists the IPCB in identifying and developing pertinent environmental, economic, and legal considerations to assure that ultimate disposition of a site-specific proposal is consistent with state and federal legislation, including Clean Water Act policies and objectives. Procedural rules governing the conduct of these matters include specific reference to Federal water quality regulations, 40 CFR 131.

The process for development of water quality standards, in the broader sense (generic and statewide applicability), is primarily the responsibility of the Planning Section. As with site specific proceedings, actual rulemaking rests with the IPCB through the public hearing process pursuant to Title VII of the EP Act. Section 4(e) of the EP Act designates the Agency as the water pollution control agency for the state for all purposes of the Clean Water Act.

Within this context, the Agency carries out water quality standards development and review activities consistent with negotiated annual program plan commitments. The underlying framework of the surface water protection program in Illinois is the protection and preservation of existing and potential uses of the states water resources. Thus, the approach to water quality standards focuses on designation of uses to be protected and water quality conditions necessary to accomplish that end. The concept of use attainability is inherent to the process. Technical evaluations encompass: a) scientific literature including federal water quality criteria and advisory documents, b) current and

historical monitoring information, c) availability and capability of source control technologies, and d) social and economic implications.

Section 303(c)(1) specifies that each state shall review its water quality standards at least every 3 years and revise as appropriate. The standards evaluation in Illinois is an ongoing process. As stated previously, specific issues to be addressed, and time schedules, are determined in accordance with the negotiated annual program plan for the Division. Individual work items may be determined on the basis of such diverse factors as Clean Water Act mandates, availability of new or revised USEPA criteria documents, modification or expansion of state statutes, developing trends in water quality, land use practices or wastewater treatment technology, support needs of other Division programs, and in response to inquiries or regulatory actions initiated by other parties (citizen groups, professional organizations, other governmental agencies).

Actual water quality standards modification identified through the review process are proposed to the IPCB in a rule-making proceeding. As proponent, the Agency supports the proposal through the public hearing process conducted by the IPCB, which by statute must address both environmental and economic implications. The Illinois Department of Energy and Natural Resources is charged with performance of an economic impact study of regulatory proposals before the IPCB.

It is a policy of IEPA to carry out its delegated NPDES permit authority by incorporation of discharge limitations sufficient to achieve the surface water quality standards of the State of Illinois and bordering states consistent with 35 Ill. Adm. Code 304.102, 309.180, Section 303 (goals and objectives) of the Clean Water Act, and its delegation agreement with USEPA.

Illinois' water resources are classified by their actual and potential use capability and have water quality standards established as appropriate to support those uses. All surface waters are designated for protection consistent with one of the following use categories: general use (including aquatic life and recreational purposes) public and food processing water supply, secondary contact and indigenous aquatic life (limited resources) and Lake Michigan waters (exceptionally valued resource). State regulations include provisions for mixing zones Section 302.102 wherein certain water quality standards do not apply. Section 302.105 contains a nondegradation principle as an additional degree of protection beyond established water quality standards for exceptionally high quality and valued water resources. The Illinois EP Act specifies that the Pollution Control Board shall take into consideration local circumstances in establishing environmental regulations. In fulfillment of this provision of the statute, a "site-specific" regulatory process is available for modification of generally applicable regulations, including water quality standards. Each of these elements are addressed within the context of assessing the need for and establishing water quality based permit limits.

Phased Total Maximum Daily Load Development

Section 303(d) List Development

The development of the Section 303(d) list involves the identification of water quality limited waters and development of a priority ranking for these waters. The detailed methodology is described in the Agency's 1994 submittal of the 303(d) list, dated May 24, 1994. However, a brief description is given below.

Identification of Water Quality Limited Waters

USEPA guidance defines water quality limited as "those waterbodies that will not or are not expected to meet water quality standards after application of technology-based controls required by CWA section 301(b) and 306." The general strategy used in the development of Illinois 303(d) list involves:

- identifying all waters not fully attaining designated uses as determined with the 1994 305(b) report (WBTS).*
- review water quality limited waterbodies as defined and eliminate those waterbodies where other requirements or factors (see Step 2, definitions of a through g) can reasonably be expected to result in the attainment or maintenance of applicable water quality standards.*
- confirm remaining waterbodies.*

IEPA also considered the screening categories for Section 303(d) list development identified in the April 1991, "EPA Guidance for Water Quality Based Decisions: The TMDL Process".

Priority Rankings

Waterbodies (streams and lakes) are ranked on the basis of severity of pollution, and waterbody uses and resource value. Severity of pollution involved grouping waterbodies by overall use attainment and then assigning a weighting factor to each level of attainment. Waterbody uses and resource values were established by assigning points on the basis of its size and such uses as public water supply and swimming. Scores for each waterbody were then obtained by multiplying the severity weighting factors with total number of impacted miles for streams or with use points for lakes.

The IEPA incorporates a phased approach to TMDL development which consists of three phases.

Phase 1 - The initial phase addresses the allocation of loads or degree of assimilative capacity of the waterbody to point sources in the watershed (Wasteload Allocation). The IEPA has formulated a number of operating procedures to standardize the derivation of discharge limitations that will assure attainment of instream water quality standards. The procedures range from use of a simple mass balance for conservative parameters to application of complex water quality models. These procedures are documented in "Illinois Strategy for Point Source Wasteload Allocation," January 17, 1991.

Phase II - The second phase consists of implementation of the necessary control actions to achieve the Wasteload Allocation. A post monitoring program is designed to evaluate the effects of the Wasteload Allocation on water quality and aquatic life. If this evaluation clearly demonstrates that water quality standards for parameters of concern will not be attained and the aquatic life will still be adversely impacted, then Phase III is initiated.

Phase III - The final phase addresses the allocation of loads or degree of assimilative capacity of the waterbody to nonpoint and natural background sources in the watershed (Load Allocation). This phase also addresses factoring in a "margin of safety" (MOS) which accounts for scientific uncertainty associated with the TMDL reflecting the actual assimilative capacity of the waterbody. This uncertainty may result from insufficient data for pollutant loadings or the aquatic resources, and estimates regarding assimilative capacity for future growth.

Public participation is accomplished through the Agency's annual Program Plan for the Bureau of Water.

GRANTS ADMINISTRATION

The Grant Administration Section is responsible for the administration of federal and state funds for construction of municipal wastewater transport and treatment systems. The Grants Section, utilizing the technical expertise of the Permit Section, and its knowledge on regulatory procedures, assures complete review and follow-up of any projects funded by the program.

The Grant Section has frequent beneficial contact with municipalities, consulting engineers, and state/federal representatives. In order to maintain these working conditions, the Agency has developed a relationship with the Illinois Municipal League, Consulting Engineering Council of Illinois and many others.

Grants has always coordinated its project review with the Areawide Regional Planning Commissions, and other state and federal agencies affected by a community's proposal for construction/rehabilitation.

Within the Agency, Grants coordinates with all sections in the Division. To assure that project outputs are coordinated with the recommendations of the water quality management plan, the Agency sends each facility plan and municipal compliance plan through an intensive review by Grant, Planning, Permit, and Field Operation staff. Each facility plan is reviewed for: accuracy in describing existing and projected conditions; satisfaction of regulatory requirements for content; and basis of design for any proposed construction/rehabilitation. Review also takes place through the Areawide Regional Planning Commissions as well as the water quality management planning agency. This coordinated reviews assures consistency with the Water Quality Management Plan, and also assures that all reasonable alternatives (such as regionalization) have been considered.

Project Priorities and Funding

Presently, the only new projects receiving grant funding are projects specifically listed as a result of the Compliance Grant Program established by the legislature in 1988.

However, since 1989, the Agency has administered a Low Interest Loan Program to provide a source of funding for wastewater treatment/transport facilities. Loan projects have been scored for funding priority by means of the priority system formally adopted by the State in May, 1990. The loan priority system differs considerably from the grant priority system in that it generates separate priority lists for each of four project classes.

- Service Continuation
- Service Expansion
- New Service
- Combined Sewer Service

Available loan funds are divided equally between the service area of the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) and the balance of the State. Within each of these two areas, available funds are then allocated to the above project classes in proportion to relative needs of each class based on approved but unfunded facilities plans as of the preceding March 31.

Specific procedures for determining priorities for loan projects can be found in 35 Ill. Adm. Code, Subtitle C, Chapter II, Part 366.

Specific procedures for issuance of loan funds under the Water Pollution Control Revolving Fund (WPCRF) Act can be found in 35 Ill. Adm. Code, Subtitle C, Chapter II, Part 365.

FIELD OPERATIONS SECTION

Compliance Monitoring, Inspections and Other Related Activities

The Division of Water Pollution Control uses a number of program elements for monitoring and maintaining compliance at regulated facilities. Inspections of various types, self-monitoring report review, compliance schedule monitoring, and stream surveys are all used to monitor how well the facility is complying with applicable regulations or permit conditions. These activities are coordinated among the Division's Field Operations, Compliance, and Planning Sections and the Division of Legal Counsel.

Field Operations Strategy

The field program strategy places top priority for field investigation and response on situations which pose threats to public health or safety or which cause or threaten to cause water quality degradation. Spills of products which threaten water resources are

handled on an emergency basis in cooperation with the Agency's Emergency Response Unit (ERU). When requested by the ERU, field staff respond to such spills within a specified minimum response time and follow prescribed spill control procedures.

Facility inspections are scheduled in accordance with several priorities and commitments. Routine compliance inspections at major dischargers are conducted according to the schedule provided in the annual program plan. In previous years, inspections have been done at all major dischargers each year. Currently, the division is developing an inspection program which will place less emphasis on major dischargers with good compliance histories, while directing additional resources toward facilities in targeted watersheds. Complete implementation of this new program will depend on the outcome of negotiations with U.S. EPA. If successful, the program will allow priorities to be set based upon water quality considerations to a greater extent that is now possible.

All inspections are conducted with the objective of preventing, detecting, and correcting violations of effluent limits and water quality standards. Field work is performed based on the consideration that all findings may be used as supporting information for any necessary enforcement action. However, an emphasis is placed on preventing effluent and water quality violations through treatment process performance evaluation, operation and maintenance recommendations, and plant record quality assurance.

An additional important component of field inspection programs is response to citizen complaints and referrals from other agencies. These activities detect violations at facilities which may not be normally regulated or inspected by the Agency.

Description and Purpose of Field Inspections:

1. **Compliance inspections:** Various levels of inspections are performed to evaluate compliance with NPDES permit requirements and with state and federal laws and regulations. A reconnaissance inspection by a technician, engineer, or environmental specialist may include collection of a grab sample and a visual observation of plant units and overall operation. A more extensive compliance evaluation is performed by professional level staff and includes preparation of federal inspection report forms, a written narrative, or field notes. Collection of a grab or composite sample may also be included. Compliance surveys may also be combined with other types of field inspections. These inspections are performed at domestic and industrial wastewater treatment facilities of all types.
2. **Grant or loan support inspections:** Interim construction and final inspections are conducted of municipal treatment plants funded by IEPA-administered grants or loans. These surveys are to ensure that plants are constructed in accordance with approved plans and specifications, and with other conditions of the grant or loan. Where existing plants are being upgraded, these inspections also assure that existing facilities are maintained in suitable operation during construction.
3. **Pretreatment inspections:** Audits and compliance inspections are conducted to specifically determine whether municipalities are implementing their approved pretreatment programs in accordance with permit requirements. Pretreatment

inspections may also include inspections of industrial users which discharge to the municipal treatment facilities.

4. **Operator assistance visits:** Various levels of technical assistance are provided to wastewater treatment plant operators to correct operational problems or provide training in operation, maintenance, or laboratory analysis skills.
5. **Complaint investigations:** Field investigations are performed at all types of facilities to verify reported violations and collect evidence for any necessary enforcement actions.
6. **Other inspections:** Non-routine field investigations are performed as required in support of permit programs, standards development, water quality monitoring programs, enforcement cases, emergency response, disaster assistance, and other Agency needs.

COMPLIANCE ASSURANCE

Self-Monitoring Report Review

A condition of all NPDES Permits is that the permittee monitor discharges and report the results to the Agency. These reports submitted by dischargers are evaluated to assure compliance with permit conditions. Instances of non-compliance are handled through procedures described in the Division's Enforcement Management System.

Compliance Schedule Monitoring

All major NPDES dischargers are reviewed monthly for determination of compliance with all aspects of the permit including compliance schedules. Schedules may be the result of grant conditions, variance or enforcement orders, or other judicial or administrative orders. Where timely compliance with enforceable schedules is not observed, compliance activities consistent with the Enforcement Management System are initiated.

Compliance Reporting

A Quarterly Non-compliance Report is prepared which includes an evaluation of all major and high priority dischargers' compliance status. The report includes instances of non-compliance along with documentation of the Agency's response to the non-compliance, and is transmitted to U.S. EPA as well as being made available to the public. The report is prepared using the Permit Compliance System, the national data base for the NPDES program. Additional internal tracking procedures document the compliance status of minor facilities.

Municipal Compliance Maintenance

Several program elements are used to ensure continued long-term compliance and pollution prevention. Specific Municipal Compliance Maintenance (MCM) program activities include monitoring of financial reports, user charge system review, State

Revolving Fund (SRF) prioritization for operation excellence, review of plant loadings, treatment plant inspections, operating personnel training, operator certification testing, review of operation/maintenance manuals, and the preparation of annual facility reports.

The effectiveness of MCM is enhanced through the preparation of an annual facility report to assist municipal officials in the identification of wastewater treatment performance trends and other early warning information to encourage timely planning for preventive and corrective actions to occur prior to a facility becoming noncompliant. The review process for the facility report is intended to increase communication among facility operators, municipal officials, and the IEPA regarding operational needs and pollution prevention/compliance maintenance. Focus and direction for the MCM initiative is obtained through an assessment process which includes the identification and ranking of municipal facilities in a relative potential problem order.

MINE POLLUTION CONTROL PROGRAM

The IEPA's Mine Pollution Control Program (MPCP) addresses environmental concerns associated with coal production in the State. This is accomplished by permit review and field inspection services partially funded through an Office of Surface Mining Reclamation and Enforcement (OSMRE), U.S. Department of Interior grant awarded to the designated State Regulatory Authority, the Illinois Department of Mines and Minerals (IDMM).

IDMM administers the federal Surface Mining Control and Reclamation Act (SMCRA) of 1977 through a delegated state program, under the Illinois Surface Mining Land Conservation and Reclamation Act and its regulations, 62 Ill. Adm. Code 1700-1850. The IEPA's responsibilities as a member of the Interagency Committee under IDMM's permanent program are to review all new applications and significant revisions in accordance with the Interagency Agreement for water quality concerns and cite specific regulations which may be violated by the proposed operations.

At the same time, the MPCP is authorized through the Illinois Environmental Protection Act and rules and regulations under Title 35, Subtitle D, Chapter 1, to maintain and enhance the waters of the State, specifically through the use of State construction and operation permits and NPDES permits. The permitting process is supplemented by field operations staff dedicated to the mine program, who monitor compliance with the IEPA permit requirements at underground and surface coal mines, secondary coal recovery operations and other mine-related facilities under IEPA jurisdiction.

The MPCP also approves disposal of coal combustion waste at coal mine NPDES permitted facilities as provided for in Section 21) r) 3) of the Environmental Protection Act. Joint guidelines were developed with IDMM for evaluation procedures to make the permitting process more efficient.

Similarly, guidelines are being finalized between IDMM and the Agency to implement the Groundwater Protection Act of 1987. Currently, groundwater management zones are being established for problem sites and future coal waste disposal sites are being evaluated with the draft guidelines which were derived from 35 IAC 620 regulations.

A storm water permitting initiative was undertaken July 31, 1992 to implement the provisions of 40 CFR 122.26 as it relates to coal mines. A storm water monitoring provision will also be incorporated into future NPDES permits.

The MPCP works closely with the Abandoned Mine Lands Reclamation Council (AMLRC) to ensure that coal mine reclamation activities on abandoned parcels are conducted in such a manner as to minimize, to the fullest extent possible, any further adverse impact to the public health, safety and/or the environment. This is achieved through a memorandum or understanding setting forth responsibilities for each organization.

Permits Section:

1. Reviews applications and significant revisions for the Interagency Committee and submits letters with appropriate comments.
2. Authors NPDES Permits, State Permits, Construction Authorization, and Letters of Approval if the proposed activities will not violate relevant regulations.

Field Operations:

1. Inspects active mines to determine their general compliance with regulations and specific compliance with their permits. Discharges are sampled, refuse disposal and drainage information from the affected area is reviewed, and operations and maintenance of all waste water systems are inspected. If operations remain out of compliance, enforcement action is initiated.
2. Other activities include citizen complaint investigation, special stream surveys, responses to mine-related emergency situations, and assisting other groups within the Agency.

Unit:

1. Participate in public hearings as required and provide technical assistance in preparing responses.
2. Assists attorneys when needed to prepare and execute enforcement cases.
3. Establishes policies and guidelines for new Agency initiatives and regulations.
4. Participates as resources allow in initiatives sponsored by other government agencies, academia, or industry on coal related issues.

WATER QUALITY MANAGEMENT PLAN (WQMP) MAINTENANCE AND REVISION

The basis and revision needs of point and nonpoint elements are different, thus necessitating specific procedures to address those needs. Point source plan elements serve as the basis for administrative determinations whereas nonpoint source plan elements are used for consistent policy and strategy evaluations. IEPA has exercised

regulatory authority in the area of nonpoint sources in Section 401 water quality certification and coordination of the Section 404 dredge and fill program with Corps of Engineers, IDOT, and IDOC. IEPA also maintains an agriculturally related NPDES permit program to address livestock waste disposal. The Agency specifies three requirements in relation to revision and maintenance of WQMP elements:

1. Identification and definition of base information required in grant and permit conformity determinations for point sources and consistency in water pollution control initiatives with regard to nonpoint source approaches. Facility planning area base maps have been approved by the Agency through the facilities planning process. These maps are incorporated into the Annual Program Plan, by reference, as part of the Illinois WQMP, and constitute the map of record for FPA boundary changes.
2. Establishment of consistent revision procedures to guarantee the integrity of base data is modified by changing circumstances. This includes criteria for those modifications which, in fact, cause a major alteration in the approved WQMP. In this context, the issuance of NPDES permits or approval of new facility planning areas constitute amendments to the WQMP.
3. Methods for conflict resolution which allow for expedient and accountable determinations of fact related to point source and nonpoint source WQM issues. Conflict resolution is provided for by administrative rules through Illinois Administrative Code 351; Procedures and Requirements for Revising the Water Quality Management Plan. Determinations resulting from the use of the conflict resolution rules, are certified by the Director of the Agency on a case by case basis.

These rules apply to the following revisions of the WQMP:

- a) Amendments to population projections for the twenty-year planning period, set forth in approved facilities plans, that are greater than 10% for communities under 10,000 population of 5% for communities over 10,000 population.
- b) Amendments identifying new designated management agencies.
- c) Amendments terminating the status of designated management agencies for failure to implement the requirements of a WQMP.
- d) Amendments to Facility Planning Area Boundaries.
- e) Amendments to include sewage treatment works not identified in a WQMP where a facility planning agency, designated management agency, or an areawide planning agency objects to the inclusion of the sewage treatment works within its boundaries.
- f) Other amendments where a significant degree of public interest exist to warrant the use of the conflict resolution procedures.

The Agency is now operating under the consolidated State and Areawide WQM plan and is implementing these three maintenance and revision requirements. The WQMP serves as the focal point for the continuing process of water quality management planning in the State. *The WQMP is updated annually in the Program Planning Process. All revisions are incorporated into the WQMP and are available for public review and comments through the Program Planning Process.*

The WQMP is a product of this Agency's work with other state regional and local agencies, as well as interested individuals, to consolidate and standardize a water quality management format for Illinois. Following months of discussion, including public review and comments, the WQMP was certified by the Director of the Agency and forwarded to the USEPA Regional Administrator in July, 1983. Following further review and revision, the Plan was unconditionally approved by the USEPA in May, 1984.

TARGETED WATERSHED APPROACH

The purpose of the Targeted Watershed Approach (TWA) is to describe the framework for prioritizing the Agency's water pollution control program activities within targeted watersheds. The Agency is committed to directing available resources to targeted watersheds where the greatest environmental benefit can be realized. To the extent that flexibility is available in our mandated and delegated responsibilities under the Federal Clean Water Act and State statutes, the Agency targets those programs and watersheds that have the greatest impact on human health issues and ecosystem protection. The TWA represents a preliminary attempt to develop a watershed protection approach. *Additional refinements based on further field staff and best professional judgment along with public review and comment made through the Program Planning Process, will be incorporated as the TWA develops.*

The TWA was conceived and developed primarily to facilitate water quality management planning. Objectives for the utilization of this approach in Illinois are to:

- Identify watersheds with the most critical water quality problems and direct programs and resources to the solution of those problems.
- Direct programs and resources to those watersheds considered to have the highest potential for improvement based on the State's Biological Stream Characterization process and other factors.
- Protect existing high quality water resources considered to be threatened (i.e., those waters displaying declining water quality trends but still fully supporting overall use attainment).
- Integrate point and nonpoint source program activities.

The TWA will be utilized by the Agency in water quality management planning activities for both point and nonpoint source programs. For nonpoint source program efforts, this approach will be utilized to prioritize staff efforts related to data collection, technical

assistance, education/information, and as a consideration in determining funding priorities for state and federal programs.

COORDINATION WITH OTHER PLANNING AND NATURAL RESOURCE MANAGEMENT PROGRAMS

The planning process includes the coordination and integration of water quality management planning in state planning areas and in designated areawide planning areas and coordination of water quality management planning with related federal, state, interstate, and local comprehensive, functional, and other development planning activities, as described in 40 CFR Part 130.

The Agency gives high priority to the coordination of water quality management planning with other planning and activities of other organizations involved in the Continuing Planning Process in order to prevent duplication of planning tasks and duplicated or inadequate funding for planning, to ensure compatibility of growth projections and land use data, policy and program recommendations, and compatibility of planning boundaries and planning organizations.

To foster this sense of coordination the Agency has cooperative arrangements with several agencies, which are summarized below:

Great Lakes Program

The Agency has been actively working on USEPA/Great Lakes States work groups to develop the Lake Michigan Area-wide management plan. The Great Lakes Program office in the Bureau of Water has a full time staff person assigned to Lake Michigan LaMP activities and the Waukegan Harbor Remedial Action Plan activities in addition to some other Great Lakes assignments. Great Lakes program staff are also working on technical committees related to development and implementation of the Great Lakes Water Quality Guidance and the Great Lakes Toxics Reduction Effort. The Great Lakes Program staff coordinate with all staff within the Illinois EPA on initiatives related to implementation of toxic control on the Great Lakes from all media sources. This also includes promotion of and implementation of programs to prevent pollution on the Great Lakes. Great Lakes Program staff have also been active on the steering committee to plan the first State of the Lakes Ecosystem Conference scheduled for October of 1994.

Pollution Control Board

The EP Act assigns to a seven-number Pollution Control Board the responsibility of establishing the basic regulations and standards necessary for preservation of our environment. Comprehensive regulations for water pollution control were adopted by the Board in January and March, 1972; regulations governing environmental aspects of mining were adopted in May 1972; regulations governing livestock feedlots were adopted on September 5, 1975. Regulations to implement the state's NPDES program were adopted by the Board on August 29 and September 5, 1974.

In addition to its policy-making role, the Board also functions as the court of original jurisdiction in requests for variances from its regulations, which it is required by law to grant when justified, and also for enforcement actions under either the EP Act itself or Board regulations promulgated under that Act.

Department of Energy and Natural Resources

The EP Act established the Department as the research and education arm of the state's environmental protection apparatus. It has also provided the administrative structure for state-sponsored applied research and demonstration projects in many areas of concern to the water pollution control effort. Considerable effort is devoted to making the projects undertaken by the Department reflective of the concerns of the Agency and the Board.

Office of The Attorney General

The Illinois Attorney General handles the litigation related to water pollution matters. Complaints under the EP Act usually are prosecuted by the Attorney General's staff following development of the case and referral by the Agency. This arrangement as discussed in the Enforcement Management System represents a key aspect of the state's program.

Department of Mines and Minerals.

Primary jurisdiction over pollution resulting from petroleum production operations resides with the Department of Mines and Minerals. The Department of Mines and Minerals maintains surveillance to assure that waters of the state are not polluted by crude oil or brine from oil fields, and has the authority to shut down any oil production facility which may be causing such pollution. While the Department of Mines and Minerals has primary jurisdiction for the implementation of the Surface Mining Act, the Agency has an on-going mine waste program designed to integrate water pollution concerns into the overall mine program.

Department of Public Health

A number of the activities of the Department of Public Health are directed toward prevention of the public health problems which may result from inadequate sewage treatment and the resulting water pollution:

1. Administration of the Private Sewage Disposal Licensing Act, which encompasses small, private sewage disposal systems which are generally not within the scope of the Agency's jurisdiction. This Act also provides for licensing of private sewage disposal contractors.
2. Administration of the Water Well Construction Code, intended to prevent pollution of the groundwater.
3. Licensing of mobile home parks, youth camps, recreational camps, and migrant labor camps to assure, among other things, that proper disposal of sewage and solid waste is provided.

4. Administration of the state's radiological health program, which includes monitoring of radioactivity levels in streams near all nuclear power plants, and provision of an Emergency Response Team in the event of a release of radioactive materials to the environment.

Interagency Committee on Pesticides

The Interagency Committee on Pesticides is a group established by statute which consists of representatives of several state agencies with interests in the use and regulation of pesticides. The principal state authority for regulation of pesticides resides with the Illinois Department of Agriculture.

Review of Environmental Impact Statements

The Agency reviews and comments where appropriate upon all environmental impact statements submitted under the National Environment Policy Act.

State Water Plan Task Force

The Governor of Illinois established a State Water Plan Task Force to develop a State Water Plan. The twelve state agencies with responsibilities for water resource management or coordination were instructed to participate in the task force. The State Water Plan Task Force started its work in July of 1980. In January of 1984, it published the Illinois State Water Plan. The Agency was involved in the development of the State Water Plan, particularly the five issues for which the Agency was assigned lead agency responsibilities. These five issues were: Integrated Wastewater Management; Protection of Underground Water; Integrated Water Management; Stream and Lake Use Management; and Water Resources Permit Coordination. The plan is updated periodically and the Task Force continues to operate in order to assure communication and coordination among the various State agencies that have water related responsibilities.

Illinois State Clearinghouse

The State maintains a "Clearinghouse" for review of projects for consistency with other agencies' interests. The Clearinghouse agencies are listed below:

Illinois Department of Transportation
Illinois Attorney General's Office
Illinois Environmental Protection Agency
Illinois Bureau of the Budget
Illinois Military and Naval Department
Illinois Department of Conservation
Illinois Nature Preserves Commission
Illinois Capital Development Board
Illinois Commission of Intergovernmental Cooperation
Illinois Secretary of State
Illinois Department of Agriculture

Illinois Commission on Human Relations
Illinois Economic and Fiscal Commission
Illinois Department of Public Aid
Illinois Department of Energy & Natural Resources
Illinois Department of Aging
Illinois House Democratic Appropriations Staff
Illinois Department of Commerce & Community Affairs
Illinois Housing Development Authority
Illinois Department of Veteran's Affairs
Illinois Bureau of Railroads
Illinois Emergency Services and Disaster Agency
Illinois Department of Labor
Illinois Department of Rehabilitation Services
Governor's Office of Manpower
Illinois Department of Mines & Minerals
Illinois Arts Council
Department of Local Government Affairs
Illinois Comptroller's Office
Illinois Board of Higher Education
U.S. Housing and Urban Development
Illinois Department of Children & Family Services
Division of Aeronautics, Capitol Airport
Office of the State Fire Marshall
Illinois Department of Public Health
Illinois State Board of Education
Illinois Department of Corrections
Office of the Auditor General
Illinois Air National Guard
Illinois Department of Law Enforcement
Military & Naval Department, Camp Lincoln
Governor's Planning Council on Developmental Disabilities
Illinois Hall of States
Farmers Home Administration
University of Chicago
Illinois Historic Preservation Agency

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REGULATORY REFERENCE AND CORRESPONDING CPP SECTIONS

- 130.5(b)(1) - **Permitting and Compliance Assurance Sections**
- 130.5(b)(2) - **Planning and Coordination with other Planning and Natural Resource Management Programs Sections.**
- 130.5(b)(3) - **Standards and Water Quality Based NPDES Permit Limits Sections**
- 130.5(b)(4) - **Water Quality Management Plan Maintenance and Revision Section**
- 130.5(b)(5) - **The Continuing Planning Process (Intro) and The State Program Sections**
- 130.5(b)(6) - **Water Quality Standards Within the CPP Context and WQM Plan Maintenance and Revision Sections**
- 130.5(b)(7) - **Permitting Section**
- 130.5(b)(8) - **Construction Grants Administration Section**
- 130.5(b)(9) - **Permitting**

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