


FY2018/2019 PERFORMANCE  
PARTNERSHIP AGREEMENT  
BETWEEN  
ILLINOIS EPA AND U.S. EPA REGION 5

We are pleased to execute our seventeenth Performance Partnership Agreement. This agreement sets forth our mutual agenda for continued environmental progress and our expectations for the state/federal relationship. We have assembled a comprehensive document of goals, outcomes, strategies and measures for programs funded through the Performance Partnership Grant.

The execution of this agreement demonstrates our continuing commitment to environmental improvement that is both cost-effective and responsive to public concerns; and to finding better ways to accomplish our regulatory objectives.

Entered into on this day September 29, 2017

  
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Alec Messina  
Director  
Illinois EPA

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Robert A. Kaplan  
Acting Regional Administrator  
U.S. EPA Region 5

## TABLE OF CONTENTS

I.	General Purpose and Context .....	3
II.	Joint Priorities.....	3
III.	Joint Planning and Evaluation Process .....	5
IV.	Enforcement and Compliance Assurance .....	5
V.	Quality Management Plan.....	6
VI.	Environmental Justice .....	6
VII.	Dispute Resolution Process .....	7
VIII.	Reporting .....	7

### Media Programs Planning and Outputs

Attachment A - Bureau of Air .....	8
Attachment B - Bureau of Land.....	20
Attachment C - Bureau of Water.....	28

## **I. GENERAL PURPOSE AND CONTEXT**

The Federal Fiscal Year 2018-2019 (FY18/19) Performance Partnership Agreement (Agreement) sets forth the mutual understandings reached regarding our state/federal relationship, and identifies the desirable environmental outcomes and performance expectations for the programs funded through the Performance Partnership Grant (PPG) for the period of October 1, 2017, through September 30, 2019. The parties to this Agreement are the Illinois Environmental Protection Agency (Illinois EPA) and Region 5 of the United States Environmental Protection Agency (Region 5).

### **A. State/Federal Environmental Partnership**

This Agreement is designed to be consistent with the "environmental partnership" as described in the National Environmental Performance Partnership System (NEPPS). The parties concur with the principles that are enumerated in the NEPPS and are proceeding in accordance with the framework shown therein.

### **B. Relationship of Agreement to Grants**

Illinois EPA will operate under a PPG in FY2018/2019. The attachments to this Agreement serve as specific work plans for the grants included in the Illinois PPG. The attachments contain the three Essential Elements required by Grants Policy Issuance 11-03, and will also be used to report accomplishments on an annual basis. The measures and commitments in the work plans will be reviewed and updated as needed on an annual basis.

Illinois EPA operates under a PPG to gain more flexibility in use of federal funds, to reduce the administrative burden of having numerous, specific categorical grants/work plans, and to continue some key resource investments in priority activities. To best achieve the administrative benefits of a PPG, fewer grant actions and awards are desirable. However, where an issue is identified in a single media program, Region 5 will move to award the remaining resources while seeking to resolve the issue. Both agencies commit to timely identification and appropriate level of engagement on all such issues.

The parties also recognize that some specific project grants will continue in effect and operate in concert with this Agreement. The FY18/19 federal PPG to Illinois EPA includes the following programs for which this Agreement serves as the program commitment:

1. Air pollution control program (CAA, Sec. 105)
2. TSCA compliance assurance
3. Hazardous waste management program
4. Underground injection control program
5. Water pollution control program (CWA, Sec. 106)
6. Public water system supervision program

Non-PPG grant activity covered in the Agreement includes components from the following sources:

1. Title V permitting and compliance activities under the Clean Air Act amendments
2. Nonpoint source pollution control program (CWA, Sec. 319/TMDL)

## **II. JOINT PRIORITIES**

Joint priorities represent a subset of environmental program responsibilities that Illinois EPA and Region 5 agree represent investment priorities. Examples of Joint Priorities are as follows:

1. The program area is an important, newly developed initiative that requires the attention of both Illinois EPA and Region 5 to adequately develop and implement.
2. The program area is at risk of functioning inadequately, creating a significant vulnerability to the
3. The program area represents a long-term strategic investment opportunity.
4. The program area offers the opportunity to demonstrate innovations to promote environmental improvements or enable efficiency enhancements.

Illinois EPA and Region 5 have currently identified the following Joint Priorities:

- Complete outstanding action regarding CAFO inventory, permitting and reporting.
- Assist water systems in evaluating risks from Harmful Algal Bloom (HAB) toxins.
- Achieve Corrective Action 2020 goals for CA725 (human health protected) and CA750 (groundwater contained).
- Oversee the Hartford site remediation project to assure the health and safety of local residents are protected during emergency situations.

For the CAFO Joint Priority identified above, Illinois EPA and Region 5 agree to collaborate to address the eight major action items below to complete the 9/5/2014 Work Plan Agreement and strengthen the Illinois CAFO NPDES program. Successful completion of these eight major action items would provide a basis for USEPA to respond to the 2008 citizen petition to withdraw Illinois NPDES program authorization.

1. Maintain a CAFO inventory that identifies all CAFOs, including verified medium CAFOs.
2. Continue to submit quarterly CAFO Tracker report.
3. Revise and reissue the general permit for large CAFOs.
4. EPA action on state CAFO Rule amendments.
5. Revise the SOP for CAFO NPDES permits to incorporate any necessary changes due to the CAFO Rule amendments.
6. Take timely and appropriate actions on any backlog of CAFO permit applications.
7. Illinois EPA will provide to Region 5 a description of the steps the State has taken to enhance the process for review of nutrient management plans and incorporation of nutrient management terms into permits.
8. Evaluate the effectiveness of state implementation of actions required by the 2011, 2013 and 2014 Work Plan Agreements including revisiting the final workload assessment to determine if it reflects the current CAFO program needs.

For E-Enterprise Joint Priorities, Region 5 and Illinois EPA will work to collaboratively streamline and apply advanced technology across agencies and programs to make business processes more efficient and effective. E-Enterprise will be implemented by operating in a joint governance partnership to: 1) improve environmental protection through better program performance by streamlining and modernizing business processes and promoting the use of advanced information and monitoring technologies; and 2) enhance services to stakeholders and partners while reducing transaction costs and burdens for the regulated community and governmental agencies. Where applicable, Illinois EPA has identified E-Enterprise goals in the Agreement.

Congress requires U.S. EPA to negotiate a fair share objective with each state for procurement dollars covering supplies, construction, equipment and services. The current negotiated rates require, to the fullest extent possible, that at least 18 percent of federal funding for prime and subcontracts awarded in support of U.S. EPA programs be made available to businesses or other organizations owned or controlled by socially and economically disadvantaged individuals, including women and historically black colleges and universities, based on an assessment of the availability of qualified minority business enterprises (MBE) and women-owned businesses (WBE) in the relevant market. Accordingly, for any grant or cooperative agreement awarded in support of this Agreement, the parties agree to ensure that a fair share objective will be made available to MBEs and WBEs.

### III. JOINT PLANNING AND EVALUATION PROCESS

40 CFR 35.115 requires the Illinois EPA and U.S. EPA to develop a process for jointly evaluating the workplan components and activities agreed to under this PPA. The evaluation process will include:

1. A discussion of accomplishments as measured against workplan commitments;
2. A discussion of the cumulative effectiveness of the work performed under all work plan components;
3. A discussion of existing and potential problem areas; and
4. Suggestions for improvement, including, where feasible, schedules for making improvements.

The Region 5 Joint Evaluation process includes three main components:

1. Review of the Annual Performance Report
2. Program evaluation activities including program meetings, conference calls, on-site visits, or advanced post-award monitoring activities defined under EPA Order 5700.6A2, "Policy on Compliance, Review and Monitoring"
3. Midterm Assessment Meeting (optional)

The Illinois EPA and Region 5 agree that evaluations will occur via the submission of the Annual Performance Report and in accordance with each program's post-award management process (e.g. meetings, conference calls, on-site reviews, etc.).

The Annual Performance Report will be submitted 90 calendar days after the annual reporting period for this PPA, and will meet the requirements of 2 CFR 200.328 and 40 CFR 35.115. Final financial and performance reports will also be submitted 90 calendar days after the end of the PPA period per the closeout requirements of 2 CFR 200.343. The Illinois EPA will notify Region 5 if there are delays in meeting these deadlines.

Additionally, program meetings, conference calls, and other post-award management activities may be used to satisfy the Joint Evaluation requirements only if:

1. The activity covers the evaluation process requirements of 40 CFR 35.115; and
2. There is documentation summarizing the evaluation activity. Program documentation may include email/letter correspondence, meeting minutes, or a program report.

The Illinois EPA and Region 5 agree that all evaluation reports will be included in both agencies' files in accordance with 35.115(d). The evaluation process schedule is as follows:

<u>Actions</u>	<u>FY2018</u>	<u>FY2019</u>
Finalize FY18/19 Agreement	September 2017	
Senior Management Mid-Course Meeting	July 2018	
Mid-Course Updates to Workplans (if needed)	September 2018	
Illinois EPA Annual PPG Report	December 2018	December 2019
Region 5 Evaluation of Annual PPG Report	February 2018	February 2019

### IV. ENFORCEMENT AND COMPLIANCE ASSURANCE

Compliance and enforcement activities to be accomplished during the term of the FY18/19 Agreement are included in the individual media program plans. However, a summary of Region 5 and Illinois EPA roles in compliance and enforcement is helpful.

The following points serve as a foundation for the Region 5 and Illinois EPA relationships in respect to compliance and enforcement activities:

- Apply the most effective use of tools to encourage and maintain the compliance of sources of all sizes. This would include compliance assistance, administrative and/or civil enforcement, and criminal enforcement.

- Use joint up-front planning to coordinate priorities, maximize agency resources, avoid duplication of efforts, eliminate surprises, and institutionalize communication.
- Manage for environmental results which support each Agency's environmental goals and objectives.
- Ensure that compliance and enforcement information is complete, accurate, and timely consistent with Region 5 and Illinois EPA policies.

Under this Agreement, Region 5 and Illinois EPA retain their authorities and responsibilities to conduct compliance assistance, compliance monitoring, and enforcement. These activities will be conducted in the spirit of cooperation and trust. Specific compliance and enforcement data needs will be discussed and shared per each Agency's applicable policies and regulations.

## **V. QUALITY MANAGEMENT PLAN**

All data reported under this Agreement will be quality assured and the Illinois EPA will continue to operate in accordance with its current approved Quality Management Plan (QMP), effective through February 27, 2018. A revised and updated draft QMP will be submitted to Region 5 at least six months prior to the expiration of the current approved QMP. Region 5 will review the revised draft QMP and provide written comments to Illinois EPA. Once the revised QMP becomes effective, it will be updated as needed, and changes will be submitted to Region 5 for approval. In addition, Quality Assurance Project Plans (QAPPs) will be developed as needed in each Bureau for project specific initiatives.

Illinois EPA will continue to submit an annual letter to Region 5 by January 31:

- identifying any minor revisions needed and/or incorporated into the QMP during the preceding year;
- confirming that the QMP approved by Region 5 is still in effect; and
- providing complete signed electronic (i.e. pdf) copies of all QAPPs, self-approved by Illinois EPA under this PPA during the preceding year.

## **VI. ENVIRONMENTAL JUSTICE**

Most of the elements in Attachment D of the 2016/2017 PPA have been completed; other elements in Attachment D and media program plans, reflect routine state Environmental Justice (EJ) program implementation that do not require reporting under the PPA. Rather than utilizing a specific workplan with planned accomplishments, this general narrative is being added to the 2018/2019 PPA to reflect Region 5's role in assisting and supporting Illinois EPA implementation of EJ principles in the context of its long-standing EJ program and EJ policies; and the mutual commitment of Illinois EPA and Region 5 to collaborate in preventing and addressing EJ concerns as needed.

Region 5 and Illinois EPA agree that fair treatment and meaningful involvement are core EJ principles. Illinois EPA is committed to protecting the health of the citizens of Illinois and its environment, and to promoting environmental equity in the administration of its programs to the extent it may do so legally and practicably. We will work with Region 5 to build our joint capacity to address EJ concerns in our day-to-day work.

Areas for collaboration include:

- Continued coordination of permitting, compliance assurance, and other program tools in areas of concern for EJ.
- Joint work to expand our knowledge and tools for identifying and prioritizing areas of concern for EJ.
- Improving communication, engagement and involvement of previously under-represented communities in our regulatory decisions and outreach.
- Considering ways to target prevention and assistance work to benefit overburdened areas.

## **VII. DISPUTE RESOLUTION PROCESS**

Illinois EPA and Region 5 will use an agreed upon dispute resolution process to handle the conflicts that may arise as we implement our environmental programs and will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure.

### **A. Informal Dispute Resolution Guiding Principles**

Illinois EPA and Region 5 will ensure that program operations:

- Recognize conflict as a normal part of the State/Federal relationship.
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve disputes.
- Approach the discussion as an opportunity to improve the product through joint efforts.
- Aim for resolution at the staff level, while keeping management briefed. Consider all issues raised but address them in a prioritized format, paying attention to time frames and/or deadlines, and escalate quickly when necessary to assure that sufficient time is allocated to the most significant issues.
- Promptly disclose underlying assumptions, frames of reference and other driving forces.
- Clearly differentiate positions and check understanding of content and process with all appropriate or affected parties to assure acceptance by all stakeholders.
- Document discussions to minimize future misunderstandings.

### **B. Formal Conflict Resolution**

There are formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 2 CFR 1500, Subpart E outlines the formal grant dispute procedures. There is also a National Pollutant Discharge Elimination System conflict resolution procedure. Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. When there is no resolution and the two weeks have passed, there should be a comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

## **VIII. REPORTING**

Information will continue to be reported to Region 5 and the National Data Systems. Programs authorized under Title 40 for which the Illinois EPA receives or wishes to receive reports or documents electronically must meet and comply with the Cross-Media Electronic Reporting Regulation (CROMERR), Part 3, Title 40 effective November 11, 2006. In accordance with the CROMERR regulation before the implementation of such reporting, the designated State program system must be approved by U.S. EPA.

**Attachment A: Bureau of Air**

**Illinois Environmental Protection Agency 2018/2019 Performance Partnership Agreement/Performance Partnership Grant**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
<b>USEPA Strategic Goal 1: Taking Action on Climate Change &amp; Improving Air Quality</b>				
<b>USEPA Strategic Objective 1.1: Address Climate Change. Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking appropriate actions</b>				
<b>Work Plan Outputs/Measures/Outcomes – Air Toxics – Toxics &amp; Global Atmosphere</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work collaboratively to address climate change and reduce greenhouse gas according to federal requirements.	David Bloomberg, Illinois EPA Melissa Hulting or Erin Newman, EPA	Both agencies have committed to an open exchange of information between the agencies.	<b>2018 Status:</b>  <b>2019 Status:</b>
<b>USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.</b>				
<b>USEPA 2011-2015 Strategic Outcomes: Reduce Criteria Pollutants and Regional Haze</b>				
<b>Work Plan Outputs/Measures/Outcomes – Federal Vehicle and Fuels Standards and Certification – Control Strategies</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control strategies such as I/M, OBD, and state fuel programs.	Kent Mohr, Mike Hills, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	<u>VIM:</u> The Illinois EPA had an ongoing contract with Applus Technologies Inc. for On-Board Diagnostics (OBD) vehicle emissions testing in Illinois’ ozone non-attainment areas. This contract provides testing through December 31, 2023.  Work to develop I/M SIP-based motor vehicle emissions modeling during 2018 and 2019 for new ozone standards.  Continue to work with Region 5 in obtaining guidance from OTAQ concerning compliance with and revisions to 40 CFR Part 51, Subpart S – Inspection/Maintenance Program Requirements.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Work on replacement of conformity consultation MOUs, so that states can use the flexibility	David Asselmeier, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will coordinate with the Chicago Metropolitan Agency for Planning, the East West Gateway Council of Governments and the Illinois Department of Transportation to	<b>2018 Status:</b>  <b>2019 Status:</b>



	and be consistent with the federal transportation conformity rules.		develop either new MOUs or regulations dealing with the transportation conformity consultation requirements.	
	Continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES.	David Asselmeier, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA Air Quality Planning Section will work on the development of required on-road mobile source emissions estimates and, if necessary, potential control measures for inclusion in SIPs addressing the 2008 & 2015 8-hour ozone and annual PM2.5 NAAQS.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Work on replacement of conformity consultation MOUs, so that states can use the flexibility and be consistent with federal transportation conformity rules.	David Asselmeier, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will coordinate with the Chicago Metropolitan Agency for Planning, the East West Gateway Council of Governments and the Illinois Department of Transportation to develop either new MOUs or regulations dealing with the transportation conformity consultation requirements.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Continue to apply for grants and to promote and implement clean diesel and alternate fuel projects to reduce diesel emissions.	Julie Armitage, Darwin Burkhardt, Illinois EPA Pamela Blakley, Anthony Maietta EPA	The Illinois EPA will continue to seek additional funding and implement projects to reduce on-road and off-road emissions utilizing the current Congestion Mitigation and Air Quality (CMAQ) Improvement programs for engine repowers, natural gas and propane vehicles, and school buses, in addition to Diesel Emission Reduction Act funding and the upcoming Volkswagen funding.	<b>2018 Status:</b>  <b>2019 Status:</b>

**Work Plan Outputs/Measures/Outcomes – NAAQS Ambient Air Monitoring**

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Operate monitors for NAAQS pollutants, NCore, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP) that meets all quality assurance and quality control regulatory monitoring requirements as stipulated in 40 CFR Part 58, Appendix A and guidance set forth in Quality Assurance Handbook of Air Pollution Measurement Systems Volume II (dated May 2013).	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	The Illinois EPA will submit the annual air monitoring network plan for the next calendar year.	<b>2018 Status:</b>  <b>2019 Status:</b>

		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Operate all NAAQS, PAMS, NCore monitors and submit the data along with the QA data to the AQS according to required schedule.	<b>2018 Status:</b>  <b>2019 Status:</b>
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Certify NAAQS pollutant data, PAMS, NCore and toxics data in AQS and provide documentation according to required schedule.	<b>2018 Status:</b>  <b>2019 Status:</b>
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will install and begin operation of both Near Road Sites in the Chicago MSA by June 30, 2018.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Illinois EPA shall continue to coordinate the Illinois Ambient Air Monitoring Network with Cook County Department of Environmental Control.	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will provide technical directives and assistance to Cook County Department of Environmental Control (CCDEC), submit monitoring data collected by CCDEC, and include the CCDEC monitoring network in the annual network plan.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Illinois EPA shall demonstrate compliance with new FEM (Forum on Environmental Measurements) policy. <a href="http://www.epa.gov/fem/index.htm">www.epa.gov/fem/index.htm</a>	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA		<b>2018 Status:</b>  <b>2019 Status:</b>
	Attend the annual Region 5 State/Local/Tribal Air Monitoring Contacts meeting. Participate in the monthly S/L/Tribal monitoring calls. Attend the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference if they are held.	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will attend the annual Region 5 Contacts meeting when held in Illinois and personnel are available. Attendance at all out-of-state conferences will occur only if out-of-state travel is approved on the State level and both funding and personnel are available.	<b>2018 Status:</b>  <b>2019 Status:</b>
	<u>Reporting:</u> Illinois EPA and EPA will continue to participate in at least quarterly conference calls between the Illinois EPA Air Monitoring Section Manager (or his or her designee) and EPA AMAS Section Chief (or his or her designee);	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will participate in conference calls with EPA to discuss updates on training, staffing, and equipment replacement and purchases.	<b>2018 Status:</b>  <b>2019 Status:</b>

	unless an alternative schedule is agreed to by both parties.			
	Equipment Replacement	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will provide regular updates in calls as necessary. Illinois EPA will discuss equipment replacement strategy with EPA as needed. EPA recognizes that this is an evergreen document that will be revised from time to time to reflect funding, regulatory changes, and unexpected events e.g., damage to a monitoring site due to tornado, hail, rain, vandalism, etc.	<b>2018 Status:</b>  <b>2019 Status:</b>
<b>Work Plan Outputs/Measures/Outcomes – Attainment Planning and Maintenance</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will continue to review air quality data and will take appropriate actions to address new violating areas.	<b>2018 Status:</b>  <b>2019 Status:</b>
	As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will continue to submit redesignation requests as appropriate.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Continue to implement all applicable PM2.5 and ozone SIPs.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will submit a 2008 ozone NNSR update in response to a finding of failure to submit by the deadline.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Submit any outstanding 1997 PM2.5 SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will submit any outstanding 1997 PM2.5 SIP elements as necessary.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Prepare recommendations on designations for revised NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by EPA.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Develop and submit an attainment demonstration SIP or redesignation request, as applicable, for the Chicago NAA addressing the 2008 ozone NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will develop and submit an attainment demonstration or redesignation request, as applicable, for the Chicago ozone NAA in accordance with the requirements.	<b>2018 Status:</b>  <b>2019 Status:</b>

	Submit SIP revisions to revise startup, shutdown or malfunction (SSM) provisions per final SIP call.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	There is a SIP Call requiring that some states, including Illinois, develop regulatory changes to address SSM and submit them to EPA. Illinois EPA is awaiting completion of EPA management's review of the SSM requirement prior to moving forward with such regulatory changes	<b>2018 Status:</b>  <b>2019 Status:</b>
	Develop transport SIPs addressing the 2015 ozone standard.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	Illinois EPA will take appropriate actions after EPA releases guidance for states on the requirements to address transport for the 2015 ozone standard.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Implement mobile source control strategies (such as I/M programs and transportation control measures) on time and consistent with SIP commitments.	Kent Mohr, Illinois EPA Pamela Blakley, Frank Acevedo EPA	Ongoing. Specifically, the I/M program is continuing to be operated and transportation control measures are continuing to be evaluated in accordance with SIP requirements.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Prepare and submit data for the 2017 National Emissions Inventory.	David Asselmeier or his designee, Illinois EPA Alexis Cain, Suzanne King, EPA	Illinois EPA will submit data for the 2017 National Emissions Inventory by December 2018.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Develop attainment demonstrations for SIPs for SO2 nonattainment areas and conduct other SO2 air quality planning in accordance with EPA rules and guidance.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will develop attainment demonstrations and conduct other SO2 air quality planning in accordance with EPA rules and guidance.	<b>2018 Status:</b>  <b>2019 Status:</b>
<b>Work Plan Outputs/Measures/Outcomes – Regional Haze – Attainment Planning and Maintenance</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Implement BART requirements.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will continue to implement BART emission limits through federally enforceable permits and its MPS/CPS rules	<b>2018 Status:</b>  <b>2019 Status:</b>
	Submit any outstanding Regional Haze SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Carolyn Persoon, EPA	The Illinois EPA will submit any outstanding Regional Haze SIP elements as required.	<b>2018 Status:</b>  <b>2019 Status:</b>

**Work Plan Outputs/Measures/Outcomes – Permitting**

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Provide Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) applications to EPA prior to the start of the public comment period.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	Illinois EPA will process PSD and NNSR construction permit applications consistent with CAA requirements, notify EPA of any anticipated issues with the applications during the monthly conference calls, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit.	<b>2018 Status:</b> <b>2019 Status:</b>
	Target issuance of PSD and NNSR permits within one year of receiving a complete permit application.	Permit Section Manager, or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to issue construction permits and PSD and NNSR permits as expeditiously as practicable. The Illinois EPA will process new applications (received after October 15, 2012) for PSD permits recognizing applicable EPA guidance on timely processing of PSD permits.	<b>2018 Status:</b> <b>2019 Status:</b>
	Timely enter BACT/LAER determinations for new major sources and major modifications into the RACT/BACT/LAER Clearinghouse (RBLC).	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will timely enter BACT/LAER determinations, including the “application accepted date” and “permit date”, into the RBLC.	<b>2018 Status:</b> <b>2019 Status:</b>
	As a PSD-delegated state, coordinate with applicants and EPA to ensure that Endangered Species Act (ESA) and National Historic Preservation Act (NHPA) consultations are handled in a timely manner.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	As related to ESA and NHPA consultations, consultation with the USFWS for the planned issuance of permits for proposed projects will be performed by EPA, working directly with applicants for proposed projects. The Illinois EPA will instruct applicants to directly contact EPA to initiate EPA’s ESA and NHPA review and consultation. The Illinois EPA and EPA will attempt to coordinate their respective roles in permitting so that ESA and NHPA consultation is handled in an efficient and timely manner and that the ESA and NHPA consultation process does not unduly delay the issuance of PSD permits.	<b>2018 Status:</b> <b>2019 Status:</b>
	Provide PSD application tracking data to EPA on a quarterly basis.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will provide to EPA quarterly updates on agreed to fields for PSD application tracking data being maintained by EPA, including information on each permit milestone and permit issuance.	<b>2018 Status:</b> <b>2019 Status:</b>

**USEPA Strategic Goal 1: Taking Action on Climate Change & Improving Air Quality**

**USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.**

**Work Plan Outputs/Measures/Outcomes – Air Toxics**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	<u>Emission Inventory</u> : (1) Develop HAP emission inventories for submission to EPA’s National Emissions Inventory (NEI) database; (2) submit data for the integrated HAP emissions inventory; (3) Quality assure, validate, and revise NEI data using EIS; and (4) Participate in Regional emission inventory workgroup conference calls.	David Asselmeier or his designee, Illinois EPA Alexis Cain, Suzanne King, EPA	The Illinois EPA will continue to provide appropriate and accurate data and work together with EPA to review and ensure the quality of data.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Implement delegated Section 112 of the Clean Air Act, as appropriate.	David Bloomberg, Illinois EPA Alexis Cain, Suzanne King, EPA	Illinois EPA continues to be an active participant in the implementation of standards under Section 112 of the Clean Air Act (e.g., MACT, area source NESHAPs). Illinois EPA has delegated authority for implementation of these regulations. Illinois EPA will continue to provide outreach, education, and other assistance to affected sources primarily through the Small Business Environmental Assistance Program.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.	Jeff Sprague, Illinois EPA Alexis Cain, Suzanne King, EPA	Illinois EPA will continue to participate in quarterly Region 5 conference calls and annual air toxics meetings as appropriate.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Review and analyze NATA data, as available. Region 5 will provide timely access to and assistance to the review of the NATA data.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in the review process for NATA.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Participate as appropriate in research projects, policy issues and task forces that address identification and reduction of	Jeff Sprague, Illinois EPA Alexis Cain, Suzanne King, EPA	Illinois EPA remains open to discussions involving its participation in a Regional Air Toxics Priority Project and/or addressing High Risk Point Sources as identified through NATA. Illinois may participate to the	<b>2018 Status:</b>  <b>2019 Status:</b>

	persistent bio-accumulative air toxic pollutants.		extent appropriate, in consideration of available resources, through emissions verification, data review and site visits.	
	<u>Great Lakes Air Deposition Program</u> : Address the deposition of persistent bioaccumulative toxics (PBTs) in the waterways of the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.	David Bloomberg or his designee, Illinois EPA Erin Newman, EPA	Illinois EPA will continue to work with USEPA to address the deposition of PBTs in the waterways of the Great Lakes Region.  Ongoing through September 30, 2018: 1. Continued development and implementation of Mercury Products Stewardship Program. Illinois EPA continues work on an initiative to ensure that mercury-containing components found in consumer and commercial products are properly managed at the end of their life use. 2. Participate in Great Lakes Regional Collaboration for regional mercury reduction strategies.	<b>2018 Status:</b>  <b>2019 Status:</b>

**USPEA Strategic Goal 5: Enforcing Environmental Laws**

**USEPA Strategic Objective 5.1: Enforcement of Environmental Laws. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.**

**Work Plan Outputs/Measures/Outcomes – Monitoring**

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2018) Implementation of the final CMS plan, for Title V and non-Title V sources, will begin the upcoming federal fiscal year. The CMS plan should meet EPA's July 14, 2014, CAA Stationary Source CMS policy.  <b>E-Enterprise Goal:</b> The Illinois EPA will use advanced monitoring techniques, when applicable and available, to monitor and document site conditions during	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will continue to submit the Illinois CMS plan to EPA and implement it as approved by EPA.  The CMS source category and frequency flags in ICIS-Air will be completed for Title V and non-Title V source universes by the state by October 15, 2017. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan. (January 1, 2018)	<b>2018 Status:</b>  <b>2019 Status:</b>

	CMS inspections when requested of and assisted by USEPA.			
	Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy. (Ongoing)	Ron Robeen or his designee, Illinois EPA Nathan Frank, EPA	The Illinois EPA will continue to inspect sources/landfills in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Track State Review Framework recommendations made by EPA to the states until completion and provide updates to USEPA, for Title V and non-Title V sources. (Quarterly)	Compliance Section Manger, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Respond to citizen complaints including those referred from EPA.  <b>E-Enterprise Goal:</b> The Illinois EPA will use advanced monitoring techniques, when applicable and available, to monitor and document site conditions when requested of and assisted by USEPA.	Ron Robeen or his designee, Illinois EPA, Nathan Frank, EPA	The Illinois EPA will continue to respond to citizen complaints and inspections will be conducted where necessary.	<b>2018 Status:</b>  <b>2019 Status:</b>

**Work Plan Outputs/Measures/Outcomes – Enforcement – Reporting**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) for the current Integrated Compliance Information System (ICIS-Air) Information Collection Request (ICR), revised Timely and Appropriate Enforcement Response to High Priority	Compliance Section Manager, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will submit MDRs in accordance with the current ICIS-Air ICR.	<b>2018 Status:</b>  <b>2019 Status:</b>



	Violations (HPVs) policy, revised Guidance on Federal Reportable Violations (FRVs) for Stationary Sources, CAA National Stack Testing Guidance for Title V and non-Title V sources. Ensure data is complete, accurate and timely consistent with EPA policies and ICR. Such language should also be included in the written agreement between the State and EPA.			
	Asbestos notification information, compliance evaluations and enforcement activities, including penalties assessed, will be reported alphabetically by owner or operator to the EPA by the State. (Annually)  <b>E-Enterprise Goal:</b> Illinois EPA will work with our IT staff to develop an Asbestos Notification form that can be submitted on-line.	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will report the number of Asbestos notifications received and will provide EPA with the number of inspections performed and enforcement actions taken, including penalties assessed.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Continue to work with USEPA, Region 5 to provide input into the design and development of future versions of ICIS-Air as it pertains to the Clean Air Act compliance and enforcement information reporting.	Compliance Section Manager, Illinois EPA Rochelle Marceillars, EPA		<b>2018 Status:</b>  <b>2019 Status:</b>
<b>Work Plan Outputs/Measures/Outcomes – Enforcement</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Conduct bi-monthly conference calls to discuss efforts made by the State to resolve known violators. During the conference calls, newly	Compliance Section Manager, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA	Illinois EPA will conduct bi-monthly conference calls with USEPA, Region 5.	<b>2018 Status:</b>  <b>2019 Status:</b>

	<p>discovered violators will be identified, case lead, evidence, timeline for resolution, status of case, data management and reporting. If data management and reporting is not discussed in the enforcement call, a separate call will be held. For State-led HPV cases unaddressed over 180-day timeframe, a discussion will be held between the agencies and determination made on what will be the best method of returning the source back into compliance, for Title V and non-Title V sources.</p>			
	<p>Conduct enforcement activities in accordance with EPA’s revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, the Clean Air Act Stationary Source Civil Penalty policy and the Revised Asbestos NESHAP Strategy, for Title V and non-Title V sources.</p>	<p>Compliance Section Manager, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA</p>	<p>The Illinois EPA will continue to conduct enforcement activities in accordance with EPA’s revised Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, the Clean Air Act Stationary Source Civil Penalty policy and the Revised Asbestos NESHAP Strategy, for Title V and non-Title V sources.</p>	<p><b>2018 Status:</b> <b>2019 Status:</b></p>
	<p>Initiate civil enforcement actions, as appropriate, and whenever necessary to protect communities. Negotiate settlements and track compliance with consent decrees and administrative orders taking all necessary actions to ensure compliance with the terms of the enforcement action, for Title V and non-Title V sources.</p>	<p>Compliance Section Manager, Illinois EPA Nathan Frank, Rochelle Marceillars EPA</p>	<p>The Illinois EPA will continue to conduct enforcement activities as deemed necessary to continue compliance with actions outlined in the Template Measurers.</p>	<p><b>2018 Status:</b> <b>2019 Status:</b></p>

## APPENDIX A

### Title V

*(Title V activities, while part of the State Air Pollution Control Program, are not funded with EPA Clean Air Act funding. Title V activities' funding comes from the State Title V fee program.)*

USEPA Strategic Goal 1: Clean Air & Global Climate Change				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Target the issuance of significant coal-fired power plant and refinery Title V permits	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	To the extent practicable, the Illinois EPA will prioritize the issuance of coal-fired power plant and refinery Title V permits.	<b>2018 Status:</b>  <b>2019 Status:</b>

**Attachment B: Bureau of Land  
Illinois Environmental Protection Agency 2018/2019 Performance Partnership Agreement/Performance Partnership Grant**

<b>Strategic Goal 3: Cleaning up Communities &amp; Advancing Sustainable Development</b>				
<b>Strategic Objective 3.1: Preserve Land</b>				
<b>Work Plan Outputs/Measures/Outcomes – Hazardous Waste Management</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
CFDA 66.801	<p>Number of hazardous waste facilities with new or updated controls</p> <p><b>E-Enterprise Goal: #2</b> <b>E-Enterprise:</b> Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.</p>	Jim Moore/ Gary Victorine-EPA	<p><b>USEPA:</b> % of hazardous waste management treatment, storage, and disposal facilities with controls in place</p> <p><b>Illinois EPA:</b> Currently, the % of hazardous waste management treatment and disposal facilities with controls in place is 100%. The % of hazardous waste management treatment, storage, and disposal facilities with controls in place will be updated, as needed.</p>	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>
	<p><b>E-Enterprise Goal: #2</b> <b>E-Enterprise:</b> 1) Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community, 2) Update available permit application forms on Illinois EPA website for the regulated community use, 3) Public notice of draft permit made available on Illinois EPA web portal.</p>	IEPA Permit Section Mgr./ Gary Victorine-EPA	<p><b>USEPA:</b> Review and reissue RCRA permits in response to renewal applications.</p> <p><b>Illinois EPA:</b> Review and reissue RCRA permits in response to renewal applications.</p> <p><u>FFY2018:</u></p> <p>Anticipate public noticing the <u>draft permit</u> for 3 sites in FFY2018:            Beaver Oil (ILD064418353)            Akzo Nobel (ILD065237851)            Vertellus Specialties (ILD006278360)</p> <p>Anticipate issuing <u>final permits</u> for 4 sites in FFY2018:            Safety-Kleen – Dolton (ILD980613913)            Beaver Oil (ILD064418353)            Vertellus Specialties (ILD006278360)            Akzo Nobel (ILD065237851)</p>	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>

			<p><u>FFY2019:</u></p> <p>Anticipate public noticing the <u>draft permit</u> for 6 sites in FFY2019:</p> <p>BFI Davis Junction (ILD980700967)  Marathon (ILD005172325)  PDC (ILD000805812)  CID (ILD010284248)  U of I (ILD041544081)  BP/Riverfront (ILD980503106)</p> <p>Anticipate issuing <u>final permits</u> for 4 sites in FFY2019:</p> <p>BFI Davis Junction (ILD980700967)  Marathon (ILD005172325)  PDC (ILD000805812)  U of I (ILD041544081)</p>	
	Amount of hazardous waste managed at commercial treatment/disposal facilities	Hope Wright/ Gary Victorine-EPA	Report tons of hazardous waste managed at commercial treatment/disposal facilities by 11/1/2018 for calendar year 2017.	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>
	% of Resource Conservation and Recovery Act (RCRA) regulated & inspected sites will be in full compliance, under an accepted compliance commitment agreement, or referred for formal enforcement within 180 days of inspection date.	Brian White/ Gary Victorine-EPA	Report Significant Non-Compliers (SNC) within compliance monitoring program.	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>
	<b>E-Enterprise Goal: #2</b>			
		Greg Richardson/ Gary Victorine-EPA	Assess and report environmental benefits that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc.	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>
	Ensure proper closure and post-closure of all inactive hazardous waste landfills.	Rob Watson/ Gary Victorine-EPA	Report % of Government Performance Results Act (GPRA) Baseline Post-Closure Universe facilities brought under control.	<p><b>2018 Status:</b></p> <p><b>2019 Status:</b></p>
	<b>E-Enterprise Goal: #2</b>		<p><b>Illinois EPA:</b> 100% (56 out of 56) of the sites in the RCRA Post-Closure Universe are considered to be under</p>	

	<b>E-Enterprise:</b> Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.		control. Illinois EPA will continue to monitor all of the sites to ensure they remain under control.	
	Ensure groundwater monitoring at permitted facilities that treat, store and dispose of hazardous waste.  <b>E-Enterprise Goal: #2</b> <b>E-Enterprise:</b> Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community to include permit modifications associated with groundwater monitoring.	Terri Myers/ Gary Victorine-EPA	<b>USEPA:</b> Report % of hazardous waste management facilities conducting detection monitoring and report % of hazardous waste management facilities conducting assessment/compliance monitoring.  <b>Illinois EPA:</b> Currently 28% of hazardous waste management facilities are conducting detection monitoring. Currently 26% of hazardous waste management facilities are conducting assessment/compliance monitoring. The % of hazardous waste management facilities conducting detection monitoring or assessment/compliance monitoring will be updated as needed.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Routine compliance monitoring activities  <b>E-Enterprise Goal: #2</b>	Todd Marvel/ Gary Victorine-EPA	<b>IEPA and Region 5 will c</b> Conduct 12 Compliance Evaluation Inspections (CEI) at Treatment, Storage, Disposal Facilities (TSDFs) in the operating TSDF universe each year, <b>via a work-share process</b> , so that a CEI is conducted at all 24 operating TSDFs once every 2 years.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Todd Marvel/ Gary Victorine-EPA	Conduct 8 Operation & Maintenance (OAM) inspections at TSDFs.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Brian White/ Gary Victorine-EPA	Conduct Financial Record Reviews (FRR) each year at all TSDFs requiring a review.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Todd Marvel/ Gary Victorine-EPA	Conduct Non-Financial Record Reviews (NRR) at TSDFs and generators as needed.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Todd Marvel/ Gary Victorine-EPA	Pursuant to the Illinois EPA RCRA Flexibility Plan for FFY 2018, conduct 85 CEIs at large quantity generators (LQG).	<b>2018 Status:</b>  <b>2019 Status:</b>

		Todd Marvel/ Gary Victorine-EPA	Pursuant to the Illinois EPA RCRA Flexibility Plan for FFY 2018, conduct 235 CEIs at small quantity generators (SQG).	<b>2018 Status:</b> <b>2019 Status:</b>
		Todd Marvel/ Gary Victorine-EPA	Conduct CEIs at conditionally-exempt small quantity generators (CESQGs).	<b>2018 Status:</b> <b>2019 Status:</b>
	Non-routine compliance monitoring activities <b>E-Enterprise Goal: #2</b>	Todd Marvel/ Gary Victorine-EPA	Conduct citizen complaint investigations as needed.	<b>2018 Status:</b> <b>2019 Status:</b>
		Todd Marvel/ Gary Victorine-EPA	Conduct follow-up inspections (FUI) as needed.	<b>2018 Status:</b> <b>2019 Status:</b>
	RCRAInfo Data Management <b>E-Enterprise Goal: #2</b>	Todd Marvel/ Allen Melcer-EPA	Illinois EPA will enter all data in a timely manner in all applicable RCRAInfo data fields for which the State is implementer of record (IOR). The IOR tables in RCRAInfo define the fields for which Illinois is the owner and has data entry responsibilities. Data will be entered within one month of the completion of any recordable RCRA program activity. Illinois EPA will also maintain and update implementer owned codes in the RCRAInfo look-up tables, will keep the RCRA program universe records current, and will submit biennial report files in accordance with timeframes established by EPA's Office of Resource Conservation and Recovery.	<b>2018 Status:</b> <b>2019 Status:</b>
	Oversight Arrangement <b>E-Enterprise Goal: #2</b>	Todd Marvel/ Gary Victorine-EPA	Illinois EPA will: a) Conduct an annual mid-year program meeting; b) Conduct at least quarterly program enforcement conference calls; c) Conduct joint inspections as needed or requested; and d) Investigate and respond to inquiries from EPA concerning facilities that do not appear to have been timely and/or appropriately addressed under Illinois' enforcement program. This will include at least one annual meeting between EPA and Illinois EPA to discuss the file audit results.	

**Work Plan Outputs/Measures/Outcomes – Underground Injection Control Program**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.433		Bur Filson/ Stephan Jann-EPA	Class I Inspections: Illinois EPA will conduct one inspection at each of the 5 Class I facilities annually covering the 7 Class I wells in the State’s inventory.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Bur Filson/ Stephan Jann-EPA	Class I File Reviews: Illinois EPA will conduct monthly compliance reviews of required reports from operators (includes monthly monitoring reports and well log data).	<b>2018 Status:</b>  <b>2019 Status:</b>
		Bur Filson/ Stephan Jann-EPA	Class I MITs (National Program Measure): Illinois EPA will ensure that 100% of Class I wells that lose MI are returned to compliance within 180 days. (SDW-7)	<b>2018 Status:</b>  <b>2019 Status:</b>
		Bur Filson/ Stephan Jann-EPA	Review and process any new and renewal permit applications, as well as any permit modifications requests, in a timely manner.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Bur Filson/ Stephan Jann-EPA	<p>Class V Closures (National Program Measure): Illinois EPA will use informal methods and enforcement including, but not limited to, violation notices and compliance commitment agreements, to close Class V wells in sensitive areas.</p> <p>Illinois EPA will report the number of closed Class V wells and notify USEPA regarding progress in closing other Class V wells within sensitive areas in Illinois. The closed Class V wells will be reported electronically through submission to the national database.</p> <p>Illinois EPA will continue efforts to review other wells as seemed appropriate per the state’s criteria until such time as EPA and Illinois EPA agree on additional activities.</p>	<b>2018 Status:</b>  <b>2019 Status:</b>
	<b>E-Enterprise Goal: #2</b>	Bur Filson/ Stephan Jann-EPA	Illinois EPA will provide updates and add new data to the national UIC database at least twice per year, April 15 and October 15, to satisfy the reporting needs formerly met through the submission of the 7520s and inventory.	<b>2018 Status:</b>  <b>2019 Status:</b>



**Strategic Objective 3.2: Restore Land**

**Work Plan Outputs/Measures/Outcomes – Resource Conservation & Recovery Act (RCRA)**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.801  Joint Priority	Number of CA 2020 GPRA baseline facilities with human exposures under control  <b>E-Enterprise Goal: #2</b> <b>E-Enterprise:</b> Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.	Jim Moore/ Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FY 2018 and FY 2019 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for.  FFY 2018: Illinois EPA will perform 2 additional CA725 determinations for a total of 122 of 126 (97%) in FFY 2018.  FFY 2019: Illinois EPA will perform 2 additional CA725 determinations for a total of 124 of 126 (98%) in FFY 2019.	<b>2018 Status:</b>  <b>2019 Status:</b>
Joint Priority	Number of CA 2020 GPRA baseline facilities with migration of contaminated groundwater under control  <b>E-Enterprise Goal: #2</b>	Terri Myers/ Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FFY 2018 and FFY 2019 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for.  FFY 2018: Illinois EPA will perform 2 additional CA750 determinations for a total of 104 of 126 (83%) in FFY 2018.  FFY 2019: Illinois EPA will perform 2 additional CA750 determinations for a total of <del>123</del> 106 of 126 (84%) in FFY 2019.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Number of CA 2020 GPRA baseline facilities with remedy construction complete  <b>E-Enterprise Goal: #2</b> <b>E-Enterprise:</b> Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.	Jim Moore/ Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FFY 2018 and FFY 2019 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for.  FFY 2018: Illinois EPA will perform 2 additional CA550 determinations for a total of 91 of 126 (72%) in FFY 2018.  FFY 2019: Illinois EPA will perform 2 additional CA550 determinations for a total of 93 of 126 (74%) in FFY 2019.	<b>2018 Status:</b>  <b>2019 Status:</b>

		Jim Moore/ Jose Cisneros-EPA	<p>EPA anticipates the FY18 National Program Manager’s Guidance for the Office of Land and Emergency Management (OLEM) to include a new Corrective Action Measure, CA800 (Ready for Anticipated Use). The new measure is intended to capture the redevelopment/ reuse potential for all sites that meet the definition of Ready for Anticipated Use (RAU). The states, including IL, will achieve national target levels once the NPM guidance is issued and take necessary actions to help Region 5 to achieve FFY 2018 and FFY 2019 GPRA goals for the 126 of 152 CA800 (Ready for Anticipated Use) sites that Illinois EPA is responsible for.</p> <p>FFY 2018 : Illinois EPA will perform 2 CA800 determinations in FFY 2018.</p> <p>FFY 2019: Illinois EPA will perform 2 additional CA800 determinations in FFY 2019.</p>	
		Jim Moore/ Jose Cisneros-EPA	<p>Take necessary actions to help Region 5 to achieve FFY 2018 and FFY 2019 GPRA goals for the 126 of 152 CA900/999 sites that Illinois EPA is responsible for.</p> <p>FFY 2018: Illinois EPA will perform 2 additional CA900/999 determinations for a total of 70 of 126 (56%) in FFY 2018.</p> <p>FFY 2019: Illinois EPA will perform 2 additional CA800 determinations for a total of 72 of 126 (57%) in FFY 2019.</p>	

**Strategic Goal 5: Enforcing Environmental Laws**

**Strategic Objective 5.1: Enforce Environmental Laws**

**Work Plan Outputs/Measures/Outcomes – Office of Solid Waste and Emergency Response**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.605	TSCA Activities  <b>E-Enterprise Goal: #1</b>	Beth Unser/ Mardi Klevs-EPA	Conduct routine TSCA inspections statewide as mutually agreed. Illinois EPA will perform 22 PCB inspections each year for FY18/19. Inspections will be targeted according	<b>2018 Status:</b>  <b>2019 Status:</b>

			to joint inspection priorities determined by Illinois EPA and USEPA. At least 3 inspections will be conducted at used oil facilities.	
		Beth Unser/ Mardi Klevs-EPA	Submit inspection reports in a timely manner, including quarterly spreadsheet of the inspections conducted. Each inspection report will include mention as to whether the area where the inspection took place meets the State's environmental justice criteria.	<b>2018 Status:</b> <b>2019 Status:</b>
		Beth Unser/ Mardi Klevs-EPA	Provide timely response to any tip or complaint regarding PCBs.	<b>2018 Status:</b> <b>2019 Status:</b>
		Beth Unser/ Mardi Klevs-EPA	Provide oversight of PCB remediation activities that require additional support, compliance assistance or sampling.	<b>2018 Status:</b> <b>2019 Status:</b>
<b>Work Plan Outputs/Measures/Outcomes – Enforcement and Rules Development/Authorization</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
CFDA 66.801	Enforcement and Rules Development Activities	Dan Merriman/ Gary Victorine-EPA	Report number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases).	<b>2018 Status:</b> <b>2019 Status:</b>
		Todd Marvel / Gary Victorine-EPA	Illinois EPA will submit Authorization Revision Applications (ARA) 9 and 10, which will include all applicable RCRA rules promulgated to date.	<b>2018 Status:</b> <b>2019 Status:</b>

**Attachment C: Bureau of Water**

**Illinois Environmental Protection Agency 2018/2019 Performance Partnership Agreement/Performance Partnership Grant**

<b>Strategic Goal 2: Protecting America's Waters</b>				
<b>Strategic Objective 2.1.1: Water Safe to Drink</b>				
<b>Work Plan Outputs/Measures/Outcomes – Water Safe to Drink</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Dave McMillan	In FY2018 and FY19, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	<b>2018 Status:</b>  <b>2019 Status:</b>
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Dave McMillan	In FY2018 and FY19, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	<b>2018 Status:</b>  <b>2019 Status:</b>
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Dave McMillan/ Rick Cobb	In FY2018 and FY19, minimize risk to public health through source water protection for 50% of CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).	<b>2018 Status:</b>  <b>2019 Status:</b>
SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Dave McMillan/ Rick Cobb	By FY2018 and FY19, minimize risk to public health through source water protection for 67% of the population served by CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).	<b>2018 Status:</b>  <b>2019 Status:</b>
SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey	Dave McMillan/ Rick Cobb	In FY2018 and FY19, 79% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for	<b>2018 Status:</b>  <b>2019 Status:</b>

	within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment and Groundwater Rules.		outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.	
SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).	Gary Bingenheimer	The Illinois EPA will maintain a pace of loan program activity that maximizes the availability of low interest financing for public water supply projects in Illinois.	<b>2018 Status:</b> <b>2019 Status:</b>
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative).	Gary Bingenheimer	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	<b>2018 Status:</b> <b>2019 Status:</b>

**Strategic Goal 2: Protecting America's Waters**

**Strategic Objective 2.1.3: Water Safe for Swimming**

**Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SS-1		Amy Dragovich	<p><u>Combined Sewer Overflow (CSO) Permits:</u> Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable.</p> <p>Illinois EPA commits to requiring monitoring and then determining if water quality standard limits are necessary on blended flows.</p>	<b>2018 Status:</b> <b>2019 Status:</b>
		Amy Dragovich	If a public hearing is necessary for EPA-reviewed permits, the proposed permit will be provided <b>within 90 days of the hearing date</b> to Region 5 as soon as practicable.	<b>2018 Status:</b> <b>2019 Status:</b>

SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated into an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: 1) implementation of an approved Long Term Control Plan (LTCP); or 2) implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.	2018 Status:  2019 Status:
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will send an update to Region 5 on a quarterly basis. Illinois EPA will update USEPA CSO LTCP status spreadsheet, and track progress toward meeting goals under the CSO Control Plan Policy.	2018 Status:  2019 Status:
<b>Strategic Goal 2: Protecting America's Waters</b>				
<b>Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis</b>				
<b>Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative).	Gary Bingenheimer	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the "green project reserve".	2018 Status:  2019 Status:
SP-10	Measure W	Amy Walkenbach	The previously selected watersheds have delisted selected pollutants of concern or have met Full Use support. Illinois EPA selected North Mill Creek (GWA) watershed to continue to meet Measure W. Targeted parameters on North Mill Creek are manganese, phosphorus and sedimentation/siltation.	2018 Status:  2019 Status:
	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained (cumulative).	Amy Walkenbach	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database, or ATTAINS.	2018 Status:  2019 Status:
WQ01a	Number of numeric water quality standards adopted or planned within 3 years	Scott Twait	In 2018 and early 2019, the Illinois EPA will review the recommendations of its Science Panel. Based on this information, in late 2019 and early 2020, Illinois EPA will work	2018 Status:  2019 Status:

	for total nitrogen, total phosphorus for all waters within the State or Territory for each of the following waterbody types: rivers/streams.		with Region 5 to develop the next step in adoption of numeric nutrient criteria to protect aquatic life and recreation uses throughout Illinois.	
		Amy Walkenbach/ Trevor Sample	<u>Illinois Nutrient Loss Reduction Strategy (NLRS)</u> : Illinois EPA, in collaboration with a broad range of stakeholders, developed and are implementing the NLRS that was finalized in July 2015. Biennial reports of progress will be developed and provided to USEPA (first report in 2017). The original NLRS calls for a review of the document and revision considerations to be made in 2020, five years after the original completion.	<b>2018 Status:</b>  <b>2019 Status:</b>
WQ-1d	Number of numeric water quality standards planned to be adopted within 3 years for total nitrogen and total phosphorus for all waters within the state or territory for each of the following waterbody types: lakes/reservoirs, reservoirs/streams, and estuaries, based on a full set of performance milestone information supplied annually by states and territories.	Amy Walkenbach	Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates by mutual agency agreement. Illinois EPA will commit to the following timeline: <ul style="list-style-type: none"> <li>• Committee will review all available science data and methodologies relevant to numeric nutrient criteria during FY18 and early FY19.</li> <li>• <del>After the committee's determination is presented and stakeholder outreach is conducted, Illinois EPA will file rule(s) with the Illinois Pollution Control Board.</del></li> <li>• <b>In 2018 and early 2019, the Illinois EPA will review the recommendations of its Science Panel. Based on this information, in late 2019 and early 2020, Illinois EPA will work with Region 5 to develop the next step in adoption of numeric nutrient criteria to protect aquatic life and recreation uses throughout Illinois.</b></li> </ul>	<b>2018 Status:</b>  <b>2019 Status:</b>
WQ03a	Number and national percent of states & territories that within the preceding 3-year period, submitted new or revised	Scott Twait	The Agency will continue to work on implementation procedures for the USEPA's national criteria for ammonia. USEPA and the Agency will evaluate compliance issues that may be faced by small facilities and develop	<b>2018 Status:</b>  <b>2019 Status:</b>

	water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.		recommendations to assist such facilities to comply with the future water quality standard.	
	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Scott Twait	Illinois EPA will work with Region 5 to evaluate the recreational uses of small, isolated rural surface waters and use that information to guide adoption of appropriate recreation uses, criteria to protect those uses and implementation strategies for facilities discharging to such waters. The Agency will then proceed with the adoption of new E. coli water quality standards to protect recreational uses once the implementation strategies for small facilities discharging into small, isolated surface waters are developed.	<b>2018 Status:</b> <b>2019 Status:</b>
	Lower Des Plaines River & Chicago Area Waterway UAA	Roy Smogor/ Scott Twait	Illinois EPA will work with Region 5 to resolve any outstanding issues regarding the submission of the uses for CAWS (part of Subdocket C) adopted by the IPCB on February 6, 2014, and the WQS for CAWS (Subdocket D) adopted by the IPCB on June 18, 2015. Illinois EPA will then submit the rules to USEPA for approval.	<b>2018 Status:</b> <b>2019 Status:</b>
	Status of Illinois' monitoring strategies and other initiatives	Gregg Good	<u>Conduct Surface Water Monitoring and Assessment Activities funded by Section 106 of the Clean Water Act:</u> <ul style="list-style-type: none"> <li>• Ambient Water Quality Monitoring Network activity at 146 ambient stream stations.</li> <li>• Intensive Basin Survey activity at approximately 75-125 stream stations pursuant to the basin rotation described in Illinois' Water Monitoring Strategy (See Appendix C, Figure 1 at <a href="http://www.epa.state.il.us/water/water-quality/monitoring-strategy/monitoring-strategy-2015-2020.pdf">http://www.epa.state.il.us/water/water-quality/monitoring-strategy/monitoring-strategy-2015-2020.pdf</a>).</li> <li>• Facility-Related Stream Survey activity at up to five facilities.</li> <li>• Ambient Lake Monitoring Program activity at approximately 25-40 lakes.</li> </ul>	<b>2018 Status:</b> <b>2019 Status:</b>



			<ul style="list-style-type: none"> <li>• Volunteer Lake Monitoring Program Tier I activity at approximately 130-160 lakes, Tier II activity at approximately 30-50 lakes, and Tier III activity as time and resources allow.</li> <li>• Lake Michigan Monitoring Program activity at approximately 25 nearshore survey sites, 2-3 Lake Michigan harbors, and 3-4 public water supply intakes.</li> <li>• Special Monitoring Survey activity for NPS/watershed, permitting, or other program on an as-needed basis.</li> <li>• Fish Contaminant Monitoring Program sample analysis activity.</li> <li>• AWQMS/STORET database management activity and regular updates.</li> <li>• 2018 Integrated Report submitted by 4/1/2018; draft 2020 Integrated Report by 7/30/2019.</li> </ul>	
Joint Priority	CWA/SDWA Integration: Harmful Algal Bloom	Dave McMillan/ Anthony Dulka/ Teri Holland	Over the period covered by this agreement, the Illinois EPA-Bureau of Water, with support from U.S. EPA Region 5 OGDW, will develop a strategy to begin reducing the risk of harmful algal blooms in Illinois reservoirs used as sources of drinking water. This strategy will include a risk-based approach that contains data collected and evaluated by both the Clean and Safe Drinking Water Act Programs.	<b>2018 Status:</b>  <b>2019 Status:</b>
	303 (d) List Development	Amy Walkenbach	The final 2018 303(d) List will be submitted to USEPA on or by 4/1/2018. The 2020 draft 303(d) List will be provided to Region 5 by 7/30/2019.	<b>2018 Status:</b>  <b>2019 Status:</b>
WQ-27	Number and national percent, of approved TMDLs, that are established by states and approved by USEPA [state TMDLs] on a schedule consistent with national policy. Extent of priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative	Amy Walkenbach	<p>Illinois EPA no longer is funding TMDL development through the PPG; as such, TMDL development will be tracked for progress per the TMDL Vision document.</p> <ul style="list-style-type: none"> <li>• TMDLs or alternatives will be completed for the priority areas identified in the Vision document.</li> <li>• Illinois EPA will provide draft TMDLs to Region 5 30 days prior to public notice, or alternative timeframe as agreed upon, for review and comment.</li> </ul> <p>Illinois EPA will develop an implementation plan that meets criteria for a watershed-based plan nine minimum element</p>	<b>2018 Status:</b>  <b>2019 Status:</b> -

	restoration approaches for impaired waters that will achieve water quality standards. These areas may also include protection approaches for unimpaired waters to maintain water quality standards.		plan for all 319 funded TMDLs. This will be reported in the NPS Program annual report.	
	In recognition that TMDLs developed by Illinois EPA are funded primarily with CWA Section 319 funds, TMDLs will be developed consistent with waters identified (either specifically, or by priority watershed) in Illinois EPA's approved Nonpoint Source Management Program Plan (NPSMP).	Amy Walkenbach	TMDLs will either address the nine elements for watershed based plans as described in EPA's Final NPS Program and Grants Guidelines for States and Territories, App. C (April 2013), or be accompanied by separate implementation plans meeting the nine elements, to provide the basis for implementation project funding with CWA Section 319 funds. Although the Plan may look different from traditional 319 NPS plans they will be accompanied by a checklist with page number identifying where the report meets each element. USEPA will have a goal of 30 days to review such plans.	<b>2018 Status:</b> <b>2019 Status:</b>
	Nonpoint Source Management Program Plan. Illinois EPA last updated its NPSMP in 2013.	Amy Walkenbach	Illinois EPA will continue to implement the approved 2013 NPSMP, annually review the Plan, updating as needed and doing a complete review and submission to Region 5 in 2018.	<b>2018 Status:</b> <b>2019 Status:</b>
	NPS workplan and 319 grant application	Amy Walkenbach	Illinois EPA will submit, and Region 5 will review and approve, annual NPS workplans consistent with the EPA's Final NPS Program and Grants Guidelines for States and Territories, and will take action to award 319 grants in accordance with the following schedule: [Note, this proposed schedule is slightly different than the one laid out in the 2000 agreement between the Agencies, but reflects current practice.] <ul style="list-style-type: none"> <li>• August 1: State competitive subgrant solicitation closes, evaluation begins</li> <li>• November 1: State NPS draft workplan due to EPA including subgrants proposed for funding</li> </ul>	<b>2018 Status:</b> <b>2019 Status:</b>

			<ul style="list-style-type: none"> <li>December 31: EPA comments on draft workplan to State</li> <li>January 31: State responds to EPA comments</li> <li>February 28: State sends full application to EPA</li> <li>April 30 or as funds received from Congress: Grant award</li> </ul>	
	Development and implementation of watershed based plans (WBP)	Amy Walkenbach	Annual NPS Program reports required as a condition of 319 grant awards shall, in addition other required items, include lists and schedules of WBPs to be developed and updated in the upcoming FY. Annual Reports shall also identify priority watersheds to be targeted in the request for proposals for NPS implementation projects. (Note: This accomplishment will only be reported in the Annual NPS Program).	<b>2018 Status:</b>  <b>2019 Status:</b>
WQ-14a	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements	Roger Callaway	Illinois EPA will enter into ICIS, all required NPDES data elements from the annual reports submitted by POTW with approved pretreatment programs. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are properly entered into ICIS.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Pretreatment standards and requirements	Roger Callaway/ Sreedevi Yedavalli/ Newton Ellens	<p>By July 15 of 2018 and 2019, Illinois EPA will provide number and percent of SIUs discharging to POTWs with approved pretreatment programs.</p> <p>Copies of all pretreatment annual reports, with the exception of MWRDGC, will be sent to USEPA by June 15. A copy of the MWRDGC pretreatment annual report will be sent to USEPA by July 15.</p>	<b>2018 Status:</b>  <b>2019 Status:</b>
	Pretreatment standards and requirements	Al Keller	Illinois EPA will commit to incorporating streamlining language in POTW permits with approved pretreatment programs requiring them to modify their SUOs to incorporate required streamlining requirements.	<b>2018 Status:</b>

			Illinois EPA will commit to incorporating permit language in major POTW permits without approved pretreatment programs to submit data on the industries from which the POTW is receiving process wastewater.	
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year	Roger Callaway	Enforcement program performance must meet or exceed expectations by maintaining a Significant Non-Compliance (SNC) rate which is less than or equal to the National Average.	<b>2018 Status:</b> <b>2019 Status:</b>
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	<b>2018 Status:</b> <b>2019 Status:</b>
		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	<b>2018 Status:</b> <b>2019 Status:</b>
	Joint Enforcement Actions Against SNC Facilities	Roger Callaway	USEPA and Illinois EPA will share joint responsibility in taking enforcement actions against <b>three</b> Industrial SNC facilities under the Industrial National Enforcement Initiative. Illinois EPA will verify the reported effluent concentration Significant Non-Compliance Category I violations (not the Discharge Monitoring Report Pollutant Loading tool). USEPA will in turn initiate a mutually agreed upon enforcement action. Illinois EPA will provide technical assistance to USEPA with respect to remedies proposed by the SNC facility. USEPA will issue and track compliance with schedule milestones and terminate the action upon completion of compliance requirements.	<b>2018 Status:</b> <b>2019 Status:</b>
Small Systems Strategy		Roger Callaway	IEPA will implement a Small System Strategy-Compliance Assistance Program on a minimum of 7 minor municipalities. Facilities will be selected based upon population, financial needs and degree of effluent violations. For the term of this agreement, IEPA will conduct intensive inspections and will partner with the facility to develop a comprehensive action plan to assist the facility to achieve compliance, where possible.	<b>2018 Status:</b> <b>2019 Status:</b>
Clean Water Action Plan	Resolve State Review Framework items	Roger Callaway/ Jim Miles	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other	<b>2018 Status:</b> <b>2019 Status:</b>

			violations of environmental regulations. On an annual basis provide the number of Violation Notices and Referrals for NPDES, Stormwater, SSO/CSO and CAFO violations.	
		Roger Callaway	Propose approach to revised LTCP for Wood River by 2018 and finalize in 2019.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Roger Callaway	Illinois EPA and USEPA Region 5 will coordinate compliance and enforcement activities to avoid duplication. Region 5 conducts inspections to implement national enforcement initiatives and other regional priorities. Region 5 will coordinate with Illinois EPA on regional activities (i.e., Industrial Enforcement Initiative).	<b>2018 Status:</b>  <b>2019 Status:</b>
		Roger Callaway	Illinois EPA and USEPA will employ Violation Tracker as a resource on a quarterly basis to discuss significant noncompliance at facilities regulated as Clean Water Act dischargers (NPDES) and that warrant newer additional action (inspection, enforcement).	<b>2018 Status:</b>  <b>2019 Status:</b>
		Roger Callaway	Single event violation (SEVs) entry will be performed along with the entry of major inspections.	<b>2018 Status:</b>  <b>2019 Status:</b>
	<b>E-Enterprise Goal: 2</b>	Roger Callaway	Illinois EPA will expand the use of electronic reporting as authorized in the NPDES Electronic Reporting Final Rule to include additional facilities as well as additional types of reports received from wastewater facilities.  In addition, Illinois EPA will ensure data flow protocols are in place so that State can begin sharing their compliance monitoring (e.g., inspection), violation determination, and enforcement action data with EPA in a timely fashion.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.	<b>2018 Status:</b>  <b>2019 Status:</b>
	Permit Activities	Al Keller	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY18/19.	<b>2018 Status:</b>  <b>2019 Status:</b>

		Al Keller	Illinois will submit a proposed permit for review by Region 5, any NPDES permit previously on the R5 review list, which is being modified or otherwise revised in response to a permit appeal.	<b>2018 Status:</b> <b>2019 Status:</b>
WQ-12a		Al Keller	<p>The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Illinois EPA has been working with several local watershed stakeholders to develop watershed-specific nutrient limits based on Illinois' narrative water quality standard. A process to develop watershed-specific nutrient limits is cumbersome. Illinois EPA will need additional time to develop a nutrient permit limit that is supported by local watershed stakeholders. Because of issues raised on nutrient limits based on the Illinois narrative standard, the number of industrial NPDES permits going to public hearing, and ongoing work to resolve and implement solutions to thermal permitting issues, Illinois EPA commits that 85% of majors will be current and 90% of minors will be current. Illinois EPA and Region 5 commit to continuing to identify and implement approaches on: nutrient limits based on narrative standard; EPA meeting its goal of reviewing selected proposed permits within 30 days. Agreement to implementing an approach to nutrient limits, resolving CSO control issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current and 90% of minor permits will be current."</p> <p>Illinois EPA will commit to maintaining a high percentage of minor permits current.</p>	<b>2018 Status:</b> <b>2019 Status:</b>
WQ-13a		Al Keller	<u>Stormwater:</u> Illinois EPA will monitor any new Federal regulations concerning these permits (i.e., effluent guidelines for construction site activities, new MS4 requirements, multi-sector general permit requirements) and modify the permits as necessary.	<b>2018 Status:</b> <b>2019 Status:</b>

WQ-19a	Number of high priority State NPDES permits that are issued in the fiscal year	Darin LeCrone	Develop new priority permit lists for FFY2018 and 2019 in conjunction with Region 5 as soon as practicable near the end of each Federal fiscal year for the upcoming year. Issue 100% of the identified priority permits by the end of each FFY.	<b>2018 Status:</b> <b>2019 Status:</b>
		Darin LeCrone	<u>Permit Backlog List:</u> Illinois EPA will submit a list of major or general permits, expired and expiring, for reissuance, by September 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	<b>2018 Status:</b> <b>2019 Status:</b>
		Al Keller/ Kevin Pierard/ Scott Ireland	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice. Upon, completion of public notice, Illinois EPA will provide Region 5 for review the proposed permit and Illinois EPA's response to comments.	<b>2018 Status:</b> <b>2019 Status:</b>
		Al Keller	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility, which includes an expansion of a facility.	<b>2018 Status:</b> <b>2019 Status:</b>
Joint Priority	Concentrated Animal Feeding Operation (CAFO) Program		<u>Work Plan Agreement:</u> Illinois EPA and Region 5 will continue to implement the 9/5/2014 Work Plan Agreement for Calendar Years 2018-2019.	<b>2018 Status:</b> <b>2019 Status:</b>
		Jim Miles	<u>CAFO Inventory and Inventory Updates:</u> Illinois EPA will re-evaluate and update SOP for maintaining the CAFO inventory by November 15, 2017, for EPA Region 5 review and approval. Illinois EPA will maintain and update the CAFO inventory in accordance with an SOP approved by USEPA. Inventory will include all confirmed large and permitted CAFO sites identified by Illinois EPA. Identify medium universe and investigate and determine if medium AFOs are CAFOs. Document how Illinois EPA evaluated if the CAFO is required to have an NPDES permit. Illinois EPA will	<b>2018 Status:</b> <b>2019 Status:</b>

			provide USEPA updates to the inventory two times annually (Feb. and Aug.) and make the inventory available to public.	
		Roger Callaway/ Jim Miles	Illinois EPA and EPA Region 5 will communicate on a regular basis, bi-monthly initially, monthly thereafter, to discuss CAFO workplan improvement and action items.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	Illinois EPA will maintain the appropriate level of FTEs to support and manage the CAFO program as agreed to by USEPA and Illinois EPA in the revised final workload assessment.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Dan Heacock	<u>CAFO Permits:</u> Take actions on CAFO permit applications in accordance with the 3/8/2013 CAFO NPDES Permits SOP and any subsequent agreed to SOP. Submit CAFO Tracker and a summary report identifying number of permit actions by the 10 <sup>th</sup> of April and October.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Roger Callaway/ Jim Miles	Illinois EPA will enter and maintain CAFO workplan inspections into ICIS.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	<u>State CAFO Inspections:</u> State will provide an annual inspection plan identifying 25 facilities. Plan should be submitted by October 31 of each year. State will submit quarterly updates that include a list of completed inspections along with copies of the inspection reports. All State inspections shall be conducted in accordance with the approved CAFO Field Procedures Manual.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	<u>USEPA Oversight Inspections:</u> USEPA will <del>will</del> may conduct oversight inspections annually selecting facilities from Illinois' annual inspection plan (see above requirement for annual inspection plan). USEPA will provide copies of final oversight inspection reports to Illinois EPA.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum within six months of their start date, and prior to conducting inspections independently. Until Work Plan Agreement is completed, Illinois EPA will provide notification to USEPA when new hires are made and date that NPDES training curriculum was completed.	<b>2018 Status:</b>  <b>2019 Status:</b>
		Jim Miles	All staff working on AFO/CAFO issues will be trained on the revised ERG. Until Work Plan Agreement is completed, State	<b>2018 Status:</b>



			will provide notification to USEPA when this training is completed for any existing or new hires.	<b>2019 Status:</b>
		Roger Callaway	State will address noncompliance at CAFOs in accordance with Illinois EPA BOW Enforcement Response Guide.	<b>2018 Status:</b> <b>2019 Status:</b>
		Jim Miles/ Chuck Gunnarson/ Roger Callaway	<u>CAFO Enforcement Updates:</u> State will submit bimonthly CAFO Enforcement Actions Summary Report. EPA will continue to schedule quarterly conference calls to discuss these reports and referred cases.	<b>2018 Status:</b> <b>2019 Status:</b>
		Jim Miles/Roger Callaway	EPA Region 5 will conduct SRF program review in FY19 to evaluate Illinois EPA's CAFO program performance.	<b>2018 Status:</b> <b>2019 Status:</b>
	Inspections <b>E-Enterprise Goal: 2</b>	Jim Miles	<u>Inspection Strategy:</u> An inspection plan, by category, will be sent to Region 5 by September 15 and will include projections for each year and consistency with EPA's National Compliance Monitoring Strategy (CMS) including Majors, Traditional Non-majors, Sewage Sludge/Biosolids, Combined and Sanitary Sewer Systems, MS4, Industrial and Construction Stormwater, Large & Medium Permitted CAFOs and facilities in the CAFO Inventory. Region 5 will comment on the Illinois EPA plan 30 days after submittal.	<b>2018 Status:</b> <b>2019 Status:</b>
		Jim Miles	<u>Stormwater Inspections in Conjunction with SWCDs:</u> Contractual agreements are in place with the designated SWCDs. These agreements govern the operations of this inspection and technical assistance program.	<b>2018 Status:</b> <b>2019 Status:</b>

## APPENDIX A

### Federal Fiscal Year 2018 and 2019 Illinois EPA and DPH Work Plan

*(Fulfills Primary Enforcement Authority for the Public Water System Supervision (PWSS) Program)*

This continuing program grant is consistent with U.S. EPA's Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. The grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes: adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting engineering evaluations (sanitary surveys), ensuring that monitoring and follow-up is conducted, and enforcing regulations.

In FY 2018, U.S. EPA will continue to focus on public health issues related to Lead and Copper Rule (LCR) implementation and will be requesting information regarding lead action level exceedances. In FY 2018, Region 5 also will pilot the use of the external SharePoint site for state PWSS programs, which is currently a work in progress.

1. **Joint Priority:** Illinois and U.S. EPA will coordinate activities to assist water systems in evaluating risks from Harmful Algal Bloom (HAB) toxins. Illinois has implemented a HAB monitoring strategy that includes evaluating toxin break-through of the water treatment process.
  - ⇒ In FFY 2018 and FFY 2019, Illinois will continue to monitor HAB toxins from up to 1/5 of the water supplies (estimate no more than 7-10 in a year) utilizing inland lakes as their source of water.
  - ⇒ As resources allow, U.S. EPA Region 5 will assist Illinois EPA by conducting confirmatory analyses by LC-MS/MS (EPA Method 544 or equivalent) at community water supplies with any detection at or above 0.3 micrograms per liter (ug/L) of total microcystin detected in finished water samples using the ELISA screening method (US EPA Method 546).
2. **Rules and Primacy:** Illinois has primacy for implementing the National Primary Drinking Water Regulations and anticipates fully implementing all aspects of its safe drinking water statutes and rules on which primacy is based. These rules will continue to be administered by the Illinois EPA and Department of Public Health (DPH). If the state is unable to implement any portion of such a statute or rule, or otherwise comply with the federal implementation regulations, the state will submit a plan describing the steps the state will take to achieve full implementation and a schedule for doing so.
  - ⇒ Illinois will continue to maintain primacy for, and implement all the drinking water rules contained in attached table.

- ⇒ Illinois submitted the Revised Total Coliform Rule (RTCR) primacy application and interim primacy has been issued. In FFY 2018, the U.S. EPA will work with the Illinois DPH to resolve issues regarding implementation of the rule at non-community public water supplies to provide the basis necessary for an approvable primacy package.
  - ⇒ Illinois EPA will continue to fully track compliance activities with the RTCR through SDWIS- State. However, IDPH has not yet completed programming to be able to fully report RTCR violations, see Data Management and Tracking item below.
  - ⇒ Illinois will provide comments on the proposed LCR long-term revision (LCRLTR), as appropriate/necessary.
  - ⇒ Illinois will implement Unregulated Contaminant Monitoring Rule (UCMR)-4 activities as described in the U.S. EPA/Illinois EPA UCMR Partnership Agreement.
  - ⇒ Illinois EPA will continue to ensure that Illinois community water supplies will continue to maintain an adequate plan for the provision of safe drinking water under emergency citations.
  - ⇒ Illinois will maintain a baseline core of individuals with the technical expertise to carry out all mandatory components of the PWSS program.
  - ⇒ U.S. EPA Region 5 will continue to track state reporting of rule violations.
3. **Engineering Evaluations (Sanitary Surveys):** Illinois will continue to maintain a group of individuals with the technical expertise needed to perform sanitary surveys.
- ⇒ Illinois will ensure that sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule. Currently:
    - Sanitary surveys for community water supplies are conducted by Illinois EPA every 3 years.
    - Sanitary surveys for non-community public water supplies are conducted once every two years by Illinois DPH or local health department staff.
      - Additionally, licensed facilities are normally inspected on an annual basis.
  - ⇒ Illinois will ensure that sanitary surveys include an evaluation of the eight essential elements: 1) source; 2) treatment; 3) distribution system; 4) finished water storage; 5) pumps, pump facilities, and controls; 6) monitoring and reporting and data verification; 7) system management and operation; and 8) operator compliance with State requirements.
  - ⇒ U.S. EPA Region 5 will track state commitments to conduct sanitary surveys within the federally required intervals.
4. **Laboratory Certification:** Illinois will continue to provide an adequate laboratory certification program for all regulated contaminants, at a minimum, to certify commercial laboratories within the State and maintain Principal State Laboratory capacity.
- ⇒ Illinois will continue to certify all laboratories that produce results for compliance with the Safe Drinking Water Act (SDWA) at least once every three years and will meet all regulatory requirements.

- ⇒ Illinois EPA's Division of Laboratories will maintain a certification program and a certified State Lab for inorganic and organic contaminants of concern.
- ⇒ Illinois DPH will maintain a certification program and a certified State Lab for bacteriologic contaminants of concern.
- ⇒ Illinois EPA and DPH will continue to submit annual questionnaires to U.S. EPA Region 5.
- ⇒ U.S. EPA Region 5 will track State commitments to conduct laboratory certification activities by the Illinois DPH and the Illinois EPA. U.S. EPA Region 5 expects to conduct a lab audit and lab program review in Illinois in FY18.

**5. Compliance and Enforcement Management:** Illinois EPA and DPH will maintain an adequate enforcement and compliance assistance program.

- ⇒ Illinois and U.S. EPA Region 5 will continue to implement data exchange to ensure that enforcement resources are targeted at the highest priority PWSs.
- ⇒ Illinois EPA & DPH will continue to address all systems not in compliance with State rule and regulation. Specifically, Illinois will address non-compliant PWSs that have a score of 11 or higher on the U.S. EPA's Enforcement Targeting Tool report.
- ⇒ As an enforcement option, Illinois will continue to refer noncompliant PWSs to the U.S. EPA Region 5 for follow-up action.
- ⇒ An annual compliance report will be submitted to EPA annually by July 1<sup>st</sup>.
- ⇒ U.S. EPA Region 5 will track State commitments under measure SDWA02 (involving addressing with a formal enforcement action or return to compliance), the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July Enforcement Targeting Tool report, and update Illinois quarterly.
- ⇒ U. S. EPA Region 5 expects to conduct an on-site File Review and Enforcement Verification of the Illinois program in September 2017. The U.S. EPA anticipates releasing the final report in FFY 2018. Once the report is final, as described in Section 2 (above), the U.S. EPA and Illinois EPA and DPH will develop necessary correction action plans to address discrepancies.

**6. Data Management and Reporting:** Illinois EPA and DPH will continue to maintain adequate data management systems (and update them for new rules, and new versions of FedRep) that track requirements for all rules. Data management will include the appropriate combination of hardware, software, and personnel to accurately and within a reasonable timeframe identify water supply operational inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all violations (including: monitoring and reporting, maximum contaminant level, maximum residual disinfectant level, treatment technique, public notice, and public information requirements).

- ⇒ Illinois EPA and DPH will continue to report to U.S. EPA actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15.

- ⇒ During FFY 2018 and FFY 2019, Illinois EPA and DPH anticipate continued use of SDWIS/State to manage water system compliance with all regulatory compliance concerns.
  - ⇒ During FFY 2018 and FFY 2019, Illinois will begin evaluating transition to the new SDWIS Prime Database.
  - ⇒ During FFY 2018 and 2019 the Illinois DPH will implement a plan (developed in FFY 2017) to more fully report RTCR violations, including Level 1 and 2 assessment information, to SDWIS/State.
  - ⇒ Illinois DPH will fully report on Public Notice violations or provide a plan to achieve full implementation as describe in Section 2, above.
  - ⇒ U.S. EPA Region 5 will track quarterly and annual data reporting requirements and raise data management concerns as necessary.
7. **Operator Certification:** Illinois will continue to maintain regulations for the operation and maintenance of all public water systems by properly certified individuals.
- ⇒ Illinois will continue to report to U.S. EPA the status of the operator certification program on an annual basis.
  - ⇒ U.S. EPA Region 5 will track completion of this report to avoid a 20% withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.
  - ⇒ During FFY 2018, U.S. EPA Region 5 staff plans to evaluate State Operator Certification Programs, to ensure the nine Baseline Standards are met, as outlined in U.S. EPA’s Operator Certification Guidelines.
8. **Capacity Development:** Illinois will continue assisting existing public water supplies (PWSs) in acquiring and maintaining technical, managerial and financial (TMF) capacity. Further, the Illinois EPA and DPH will require new PWSs to demonstrate they have the TMF capacity to operate in compliance with federal and state regulations.
- ⇒ Illinois EPA and DPH will continue to report to U.S. EPA the status of the Illinois Capacity Development Program on an annual basis. As part of the annual capacity development report, Illinois will continue to provide a list of new PWSs within the last three years and indicate if they had an ETT score of 11 or greater.
  - ⇒ U.S. EPA Region 5 will track completion of this report to avoid a 20% withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.
  - ⇒ U.S. EPA Region 5 will evaluate Illinois’ capacity development program and promote proactive efforts that would further advance capacity development in Illinois.
9. **Source Water Assessments and Protection:** Illinois will continue to update source water assessments, as resources allow, and complete source water assessment reports for new public water systems.

- ⇒ Illinois will continue to document the status of community water supply source water protection programs electronically via SDWIS/State.
  - ⇒ U.S. EPA Region 5 will continue to track the Source Water Assessment and Protection Program through SDWIS and other State and Federal Reports.
10. **Measures and Indicators:** U.S. EPA will continue to use quantitative measures to assess program performance.
- ⇒ Illinois EPA and DPH will continue to participate in semi-annual conference calls with U.S. Region 5 to discuss national program measures, Region 5 specific shared goals and special high priority queries.
  - ⇒ In FFY 2018 and 2019, U.S. EPA and Illinois anticipate a priority area of focus will continue to be the public health concerns related to Lead and Copper Rule (LCR) implementation. As such, Illinois will continue to provide information regarding lead action level exceedances upon request from U.S. EPA Region 5.
    - Illinois is implementing Illinois' Public Act 99-0922 requiring schools and daycares to sample for lead contamination in water.
  - ⇒ As described in Section 5 above, in FFY 2018 and 2019, Illinois EPA and DPH will follow-up, as appropriate, on the data and enforcement verification audit to be conducted in FFY 2017 (reported on in FFY 2018).
  - ⇒ U.S. EPA Region 5 will continue track the status of the Illinois Drinking water program with respect to national program measures, Region 5 specific shared goals and special high priority queries. These “measures and indicators” for FFY 2018 and 2019 are incorporated by reference.

<b>Primacy</b>					
<b>Rules</b>	<b>U.S. EPA Primacy Revision Application or Program Update</b>			<b>U.S. EPA Status Explanation</b>	<b>U.S. EPA Timelines and Milestones</b>
	<b>Illinois Implementation Status</b>	<b>Status</b>	<b>Date</b>		
<b>Phase II/V Contaminants</b>	Implemented	Approved	9/12/1994		
<b>Total Coliform</b>	Implemented	Approved	6/7/1993		
<b>Lead and Copper</b>	Implemented	Approved	9/12/1994		IEPA and IDPH will provide status reports twice a year (April and October) for systems with lead action level exceedances.
<b>New PWS Definition</b>	Implemented	Approved	7/29/2013		
<b>Administrative Penalty Authority</b>	Implemented	Approved	8/1/1998		
<b>Consumer Confidence Report</b>	Implemented	Extension	9/1/2007	R5 primacy backlog-R5 will add the date we received this application. The Region can also provide guidance regarding electronic delivery options for CCRs.	
<b>Operator Certification Program</b>	Implemented	Approved	2/1/2001		
<b>Interim Enhanced Surface Water Treatment</b>	Implemented	Received	1/15/2009	R5 primacy backlog-Working to approve in FY18.	
<b>Stage 1 Disinfection Byproducts</b>	Implemented	Received	1/15/2009	R5 primacy backlog	
<b>Lead and Copper Minor Revisions Rule</b>	Implemented	Received	1/15/2009	R5 primacy backlog	
<b>Public Notice</b>	Implemented	Received	9/28/2010	R5 primacy backlog	
<b>Radionuclides</b>	Implemented	Adopted	10/1/2001	R5 primacy backlog- Working to approve in FY18. R5 will add the date we received this application.	
<b>Arsenic</b>	Implemented	Approved	7/29/2013		

Primacy					
Rules	U.S. EPA Primacy Revision Application or Program Update			U.S. EPA Status Explanation	U.S. EPA Timelines and Milestones
<b>Filter Backwash</b>	Implemented	Received	1/15/2009	R5 primacy backlog	
<b>Long Term 1 Enhanced Surface Water Treatment</b>	Implemented	Received	1/15/2009	R5 primacy backlog	
<b>Variance and Exemption</b>	Implemented	Extension	9/1/2007	R5 primacy backlog-R5 will add the date we received this application.	
<b>Stage 2 Disinfection Byproducts</b>	Implemented	Approved	3/16/2012		
<b>Long Term 2 Enhanced Surface Water Treatment</b>	Implemented	Approved	3/16/2012		
<b>Ground Water Rule</b>	Implemented	Approved	7/29/2013		
<b>Lead and Copper Rule Short Term Revisions</b>	Implemented	Received	10/13/2010	R5 primacy backlog-R5 is working to approve in FY18.	
<b>Revised Total Coliform</b>	CWS Implemented, Non-CWS Partial Implementation	Received	3/20/2014	Working to resolve issues regarding stringency of the NCWS program in order to have an approvable package. R5 is working to approve in FY18..	IDPH will develop a plan and schedule in FY 18 for reporting RTCR violations and Level 1 and Level 2 assessment information into SDWIS/State.