

FY 2020/2021 PERFORMANCE PARTNERSHIP AGREEMENT

BETWEEN

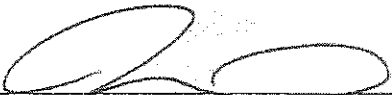
ILLINOIS EPA AND U.S. EPA REGION 5

We are pleased to execute our eighteenth 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.

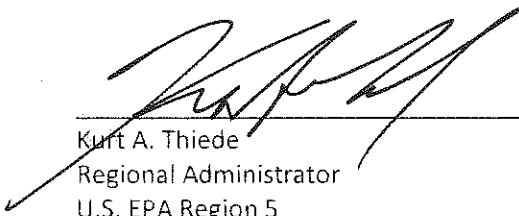
The execution of this agreement demonstrates our continuing commitment to environmental improvement that is both cost-effective and responsive to public concerns; and to finding better ways to accomplish our regulatory objectives.

FEB 07 2020

Entered into on this day _____



John J. Kim
Director
Illinois EPA



Kurt A. Thiede
Regional Administrator
U.S. EPA Region 5

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I. GENERAL PURPOSE AND CONTEXT

The Federal Fiscal Year 2020-2021 (FY20/21) 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, 2019, through September 30, 2021. 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 FY20/21. 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 FY20/21 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 integrity of environmental protection.
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, inspection, enforcement and reporting.
- Ensure Illinois EPA's Public Water Supply Supervision Primacy Program maintains adequate numbers of staff to effectively oversee all PWS Systems in Illinois.
- U.S. EPA will provide training technical assistance related to lead in drinking water issues.
- 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 will provide a basis for USEPA to respond to the 2008 citizen petition to withdraw Illinois NPDES program authorization.

1. Develop and implement a SOP that sets forth Illinois EPA's procedures to (a) identify and track all animal feeding facilities and activities subject to the State Director's authority, (b) report a CAFO inventory to Region 5, and (c) make a CAFO inventory available to the public.
2. Resolve outstanding issues regarding CAFO inspections in Compliance Monitoring Strategy.
3. Continue to submit yearly CAFO Tracker report.
4. Revise and reissue the general permit for large CAFOs.
5. USEPA action on state CAFO Rule amendments.
6. Revise the SOP for CAFO NPDES permits to incorporate any necessary changes due to the CAFO Rule amendments.
7. Take timely and appropriate actions on any backlog of CAFO permit applications.
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 the Drinking Water Program, Illinois EPA and Region 5 agree to collaborate on the following activities:

1. Ensure Illinois EPA's Public Water Supply Supervision Primacy Program maintains adequate numbers of staff to effectively oversee all PWS Systems in Illinois. Illinois EPA implements the PWSS program for community water supply wells and ensures primacy requirements are met and adequate staff are available for the non-community program administered by the Illinois Department of Public Health.
 - Over the period covered by this agreement, the Illinois EPA-Bureau of Water, with support from U.S. EPA Region 5 GWDWB, will develop a strategy to maintain a baseline core of individuals who have the technical expertise needed to implement PWSS programs, particularly for the non-community program, ensuring safe drinking water for all Illinois residents.
 - EPA and IEPA will meet on a quarterly basis to discuss the progress of hiring new staff as well as the primacy agency's plan to maintain the baseline level of staff over the next 5 years.
2. 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 breakthrough of the water treatment process.
 - In FFY 2020-2021, Illinois will continue to monitor HAB toxins from up to 1/5 of the water supplies utilizing inland lakes as their source of water.
 - U.S. EPA Region 5 will assist Illinois EPA by conducting confirmatory analyses by GC/MS/MS of HAB toxins detected in screening analyses by the ELISA method for finished water samples collected from community water supplies.

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"; and
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>FY2020</u>	<u>FY2021</u>
Finalize FY20/21 Agreement	January 2020	
Senior Management Mid-Course Meeting (if needed)	July 2020	
Mid-Course Updates to Workplans (if needed)	September 2020	
Illinois EPA Annual PPG Report	December 2020	December 2021
Region 5 Evaluation of Annual PPG Report	February 2021	February 2022

IV. ENFORCEMENT AND COMPLIANCE ASSURANCE

Compliance and enforcement activities to be accomplished during the term of the FY20/21 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 28, 2023. 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

Rather than utilizing a specific workplan with planned accomplishments, this general narrative is being added to the FY20/21 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 2020/2021 Performance Partnership Agreement/Performance Partnership Grant

USEPA Strategic Goal 1: A Cleaner, Healthier Environment				
USEPA Strategic Objective 1.1: Improve Air Quality				
Work Plan Outputs/Measures/Outcomes – Air Toxics – Toxics & Global Atmosphere				
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, Erin Newman, EPA	Both agencies have committed to an open exchange of information between the agencies.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – Federal Vehicle and Fuels Standards and Certification – Control Strategies				
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.	2020 Status: 2021 Status:
	Work on replacement of conformity consultation MOUs, so that states can use the flexibility and be consistent with the 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.	2020 Status: 2021 Status:

	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.	2020 Status: 2021 Status:
	Continue to apply for grants and to promote and implement clean diesel and alternate fuel projects to reduce diesel emissions.	Julie Armitage, Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta EPA	The Illinois EPA will continue to announce grant opportunities for the Volkswagen Mitigation, Congestion and Air Quality (CMAQ) Improvement, and Diesel Emission Reduction Act (DERA) funds. With these funds, Illinois EPA will continue to further the goals of reducing emissions and/or electrification projects.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – NAAQS Ambient Air Monitoring				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Operate required monitors including SLAMS, NCore, PM 2.5 speciation, SO2 Data Requirements Rule and PAMS according to 40 CFR part 58, EPA’s technical guidance, approved monitoring plans, and or grant agreements including Quality Management Plans (QMPs) and Quality Assurance Project Plans (QAPPs).	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	The Illinois EPA will submit the annual air monitoring network plan required by 40 CFR 58.10.	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Conduct required (monthly or quarterly) QC/QA flow checks/verifications and semi-annual flow audits of Pb, PM10, PM2.5, PM2.5 speciation monitors. Submit all QC/QA flow checks, verifications, and semi-annual flow audit results to the Air Quality System (AQS).	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Participate in EPA Technical System Audits (TSA), develop a corrective action plan to address findings, and address audit findings by completing corrective actions.	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA	Submit the five-year network assessment required by 40 CFR 58.10(d) (separately or as part of a workgroup, i.e., LADCO submission).	2020 Status:

		Michael Compher, Justin Coughlin, EPA		2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Submit SLAMs date, PAMS, NCore, and QC/QA date to AQS according to schedule in 40 CFR Part 58.16.	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Certify annual SLAMS data in AQS and provide supporting documentation and/or detailed submitter comments in the AMP600 report in the event data completeness, QA and QC completeness is not met per CFR 58.15, including exceptional event flags.	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Report real time data to AirNow for cities required to report the Air Quality Index (AQI).	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Operate NATTS sites and other air toxics study sites, according to EPA's NATTS Technical Assistance Document and the monitoring agency's QAPP.	2020 Status: 2021 Status:
		David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Review Pb and SO2 emissions to determine if new monitoring or a monitoring waiver is required (SO2 emissions are DRR specific).	2020 Status: 2021 Status:
	Illinois EPA shall continue to coordinate the Illinois Ambient Air Monitoring Network with Cook County Department of Environment and Sustainability.	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 Environment and Sustainability (CCDES), submit monitoring data collected by CCDES, and include the CCDES monitoring network in the annual network plan.	2020 Status: 2021 Status:
	Quality Assurance is in place to ensure the integrity of data quality.	David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA	Illinois EPA will develop and maintain a QAPP for all projects collecting data, pursuant to 40 CFR Part 58, Appendix A; compose, review, and update SOPS for all air monitoring activities according to the schedule identified in your PQAQ Quality Management Plan or other document such as the TSA corrective action plan; operate sufficient collocated PM10 and Pb monitors to meet requirements in 40 CFR 58, Appendix A; provide for (or participate in) adequate,	2020 Status: 2021 Status:

			<p>independent quality assurance audits for the monitoring activities supported by this grant, including Pb Performance Evaluation Program (Pb-PEP) and National Performance Audit Program (NPAP); perform annual performance evaluations for single analyzers (gases) and semi-annual flow rate audits (particulates and Pb); perform and report as required all checks on gaseous and particulate instruments per requirements in 40 CFR Part 58, Appendix A; provide oversight of the analytical laboratories responsible for analyzing air quality samples to ensure quality assurance criteria are met; review field and laboratory quality assurance data and validate air quality data; maintain certification of all quality assurance and quality control field and laboratory equipment, standards, and gases; and verify ozone transfer standards through the Standard Reference Photometer Program.</p>	
	<p>Attend and participate in EPA's national and/or regional conferences and training pertinent to air quality monitoring, quality assurance, and data reporting (e.g. the National Ambient Air Monitoring Conference). Attend other meetings/conference calls, as necessary.</p>	<p>David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA</p>	<p>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.</p>	<p>2020 Status: 2021 Status:</p>
	<p>Commit funds sufficient to maintain an adequately supported monitoring program, to include upgrades of monitoring, laboratory and quality assurance equipment as necessary to maintain an appropriate inventory of monitoring assets.</p>	<p>David Bloomberg or his designee, Illinois EPA Michael Compher, Justin Coughlin, EPA</p>	<p>Illinois EPA will commit sufficient resources for: Federal Reference Methods (FRM) and Federal Equivalent Methods (FEMs), special purpose monitors, meteorology measurements, monitoring stations and shelters with adequate access and room to support air quality measurements supported under §105 (e.g. appropriate platform space to meet siting criteria and allow for independent audits), NCore and PAMS measurements (PAMS measurements will be delayed until 2021), laboratory space and equipment, quality assurance personnel, equipment, and supplies.</p>	<p>2020 Status: 2021 Status:</p>

			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.	
Work Plan Outputs/Measures/Outcomes – Attainment Planning and Maintenance				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	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, Michael Leslie, EPA	The Illinois EPA will continue to review air quality data and will take appropriate actions to address new violating areas.	2020 Status: 2021 Status:
	As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will continue to submit redesignation requests as appropriate.	2020 Status: 2021 Status:
	Continue to implement all applicable PM2.5 and ozone SIPs.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will continue to implement all applicable PM2.5 and ozone SIPs.	2020 Status: 2021 Status:
	Prepare recommendations on designations for revised NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by EPA.	2020 Status: 2021 Status:
	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, Michael Leslie, 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.	2020 Status: 2021 Status:
	Submit SIP revisions to revise startup, shutdown or malfunction (SSM) provisions per final SIP call.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	There was 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	2020 Status: 2021 Status:

			the SSM requirement prior to moving forward with such regulatory changes.	
	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.	2020 Status: 2021 Status:
	Conduct SO2 air quality planning in accordance with EPA rules and guidance.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will conduct other SO2 air quality planning in accordance with EPA rules and guidance.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – Regional Haze – Attainment Planning and Maintenance				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Implement BART requirements.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will continue to implement BART emission limits through federally enforceable permits and its MPS/CPS rules	2020 Status: 2021 Status:
	Submit any outstanding Regional Haze SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Michael Leslie, EPA	The Illinois EPA will submit any outstanding Regional Haze SIP elements as required.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – Permitting				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	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	The 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.	2020 Status: 2021 Status:
	Issue PSD and NNSR permits within one year of receiving a complete permit application.	Permit Section Manager, or his designee, Illinois EPA	The Illinois EPA will continue to issue construction permits and PSD and NNSR permits as expeditiously as practicable. The Illinois EPA will	2020 Status: 2021 Status:

		Genevieve Damico, EPA	process PSD AND NNSR applications within one year of receiving a complete permit application.	
	Timely enter BACT/LAER determinations for new major sources and major modifications into the RACT/BACT/LAER Clearinghouse (RBLC) or its successor systems.	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 or its successor systems.	2020 Status 2021 Status:
	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 U.S. Fish and Wildlife Service 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 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.	2020 Status: 2021 Status:
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>Emissions Inventory</u> : Prepare and submit Criteria data to the National Emissions Inventory (NEI) in accordance with EPA’s schedule and the requirements contained in EPA’s Air Emissions Reporting Requirements (AERR). Quality assure NEI data, respond to EPA comments on data prior to publication, and submit revisions as needed.	David Asselmeier or his designee, Illinois EPA Alexis Cain, Margaret Sieffert, EPA	The Illinois EPA will submit data for the 2018 NEI by December 31, 2019, and data for the 2019 NEI by December 31, 2020.	2020 Status: 2021 Status:

	<u>Emissions Inventory</u> : Prepare and submit Hazardous Air Pollutant (HAP) data to the National Emissions Inventory (NEI) in accordance with EPA's schedule. Quality assure NEI data, respond to EPA comments on data prior to publication, and submit revisions as needed.	David Asselmeier or his designee, Illinois EPA Alexis Cain, Margaret Sieffert, EPA	The Illinois EPA will continue to provide and appropriate and accurate data and will work together with EPA to review and ensure the quality of data.	2020 Status: 2021 Status:
	Implement delegated Section 112 of the Clean Air Act, as appropriate.	David Bloomberg, Illinois EPA Rae Trine, Alexis Cain, 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 source.	2020 Status: 2021 Status:
	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, EPA	Illinois EPA will continue to participate in quarterly Region 5 conference calls and annual air toxics meetings as appropriate.	2020 Status: 2021 Status:
	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 Margaret Sieffert, Alexis Cain, EPA	Illinois EPA will continue to participate in the review process for NATA.	2020 Status: 2021 Status:
	Participate as appropriate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants.	Jeff Sprague, Illinois EPA Erin Newman, Alexis Cain, 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 extent appropriate, in consideration of available resources, through emissions verification, data review and site visits.	2020 Status: 2021 Status:
	<u>Great Lakes Air Deposition Program</u> : Address the deposition of persistent bioaccumulative toxics (PBTs) in the waterways of	David Bloomberg or his designee, Illinois EPA Erin Newman, Alexis Cain, EPA	Illinois will continue to develop its HAP inventory that includes persistent bioaccumulative toxics.	2020 Status: 2021 Status:

	the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.			
USPEA Strategic Goal 3: Greater Certainty, Compliance and Effectiveness				
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				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	<p>Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2019)</p> <p>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 October 4, 2016, CAA Stationary Source CMS policy.</p> <p>E-Enterprise Goal: The Illinois EPA will use advanced monitoring techniques, when applicable and available, to monitor and document site conditions during CMS inspections when requested of and assisted by USEPA.</p>	Ron Robeen or his designee, Illinois EPA Mark Messersmith, EPA	<p>The Illinois EPA will continue to submit the Illinois CMS plan to EPA and implement it as approved by EPA.</p> <p>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, 2019. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan. (January 1, 2020)</p>	<p>2020 Status:</p> <p>2021 Status:</p>
	Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA’s March 31, 1988, Revised	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.	<p>2020 Status:</p> <p>2021 Status:</p>

	Asbestos NESHAP Strategy. (Ongoing)			
	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)	Kent Mohr, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	2020 Status: 2021 Status:
	Respond to citizen complaints including those referred from EPA. E-Enterprise Goal: 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.	2020 Status: 2021 Status:
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 Violations (HPVs) policy, revised Guidance on Federal Reportable Violations (FRVs) for Stationary	Kent Mohr, Illinois EPA Mark Messersmith, EPA	The Illinois EPA will submit MDRs in accordance with the current ICIS-Air ICR.	2020 Status: 2021 Status:

	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) E-Enterprise Goal: 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 Mark Messersmith, 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.	2020 Status: 2021 Status:
	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.	Kent Mohr, Illinois EPA Mark Messersmith, EPA	The Illinois EPA will continue to work with Region 5 to address inconsistencies between ICIS-Air and the Illinois EPA data.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – Enforcement				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Conduct bi-monthly conference calls to discuss efforts made by the State to resolve known violators. During the conference calls, newly	Kent Mohr, Illinois EPA Nathan Frank, Mark Messersmith, EPA	Illinois EPA will conduct bi-monthly conference calls with USEPA, Region 5.	2020 Status: 2021 Status:

	<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>Kent Mohr, Illinois EPA Nathan Frank, Mark Messersmith, 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>2020 Status: 2021 Status:</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>Kent Mohr, Illinois EPA Nathan Frank, Mark Messersmith, 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>2020 Status: 2021 Status:</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: A Cleaner, Healthier Environment				
USEPA Strategic Objective 1.1: Improve Air Quality				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Provide data in a timely manner on Title V permits to EPA for entry into the Title V Operating Permits System (TOPS) or its successor systems	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will submit all data elements required by TOPS to EPA by January 31 and July 31 for the reporting periods July 1 to December 31 and January 1 to June 30, respectively.	2020 Status: 2021 Status:
	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.	2020 Status: 2021 Status:
	Issue new* Title V permits with 18 months of application completeness	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	To the extent practicable, the Illinois EPA will prioritize the issuance of new* Title V permits.	2020 Status: 2021 Status:
	Issue significant modifications within 18 months of application completeness.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will aim to issue significant modifications within 18 months of determining the applications to be complete.	2020 Status: 2021 Status:

	Issue renewal of Title V permits in a timely manner and reduce the backlog of renewal permits.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will strive to maintain the backlog of Title V renewal applications as reported in items 6a and 6b of TOPS at 10 percent or better of the Title V permit universe.	2020 Status: 2021 Status:
	Participate with EPA in Title V permit program evaluations, set targets to respond to EPA's evaluation report, and implement recommendations.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will cooperate with EPA during the Title V permit program evaluations and shall set targets to respond to EPA's evaluation report and implement recommendations.	2020 Status: 2021 Status:

*A "new" Title V permit means the first issuance of a Title V permit to a new or existing Title V source that is applying for a Title V permit for the first time.

**Attachment B: Bureau of Land
Illinois Environmental Protection Agency 2020/2021 Performance Partnership Agreement/Performance Partnership Grant**

Strategic Goal 1: A Cleaner, Healthier Environment				
Strategic Objective 1.3: Revitalize Land and Prevent Contamination				
Work Plan Outputs/Measures/Outcomes – Hazardous Waste Management				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.801	<p>Number of hazardous waste facilities with new or updated controls</p> <p>E-Enterprise Goal: #2 E-Enterprise: Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.</p>	Rob Watson/Scott Ireland EPA	<p>USEPA: % of hazardous waste management treatment, storage, and disposal facilities with controls in place</p> <p>Illinois EPA: 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>2020 Status:</p> <p>2021 Status:</p>
	<p>E-Enterprise Goal: #2 E-Enterprise: 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>	Rob Watson/Scott Ireland EPA	<p>USEPA: Review and reissue RCRA permits in response to renewal applications.</p> <p>Illinois EPA: Review and reissue RCRA permits in response to renewal applications.</p> <p>FFY2020: Anticipate public noticing the <u>draft permit</u> for 10 sites in FFY2020:</p> <p>Beaver Oil (ILD064418353) [draft denial] Akzo Nobel (ILD065237851) PDC (ILD000805812) BP/Riverfront (ILD980503106) Kinder Morgan (ILR000191304) ArcelorMittal (ILD000781591) Cabot Corp (ILD042075333) Safety Kleen - Caseyville (ILD981097819)</p>	<p>2020 Status:</p> <p>2021 Status:</p>

			<p>Safety Kleen – Urbana (ILD981088388) Clean Harbors – Pecatonica (ILD980502744)</p> <p>Anticipate issuing <u>final permit</u> for 9 sites in FFY2020:</p> <p>Akzo Nobel (ILD065237851) PDC (ILD000805812) BP/Riverfront (ILD980503106) Kinder Morgan (ILR000191304) ArcelorMittal (ILD000781591) Cabot Corp (ILD042075333) Safety Kleen - Caseyville (ILD981097819) Safety Kleen – Urbana (ILD981088388) Clean Harbors – Pecatonica (ILD980502744)</p> <p>FFY2021: Anticipate public noticing the <u>draft permit</u> for 5 sites in FFY2020:</p> <p>Alton Steel (ILD006280606) US Ecology (ILD045063450) Argonne National Lab (IL3890008946) Greenfield Env Trust (ILD020367561) Laraway RDF (ILD074411745)</p> <p>Anticipate issuing <u>final permit</u> for 5 sites in FFY2021:</p> <p>Alton Steel (ILD006280606) US Ecology (ILD045063450) Argonne National Lab (IL3890008946) Greenfield Env Trust (ILD020367561) Laraway RDF (ILD074411745)</p>	
	% of Resource Conservation and Recovery Act (RCRA) regulated &	James Jennings/ Mardi Klevs EPA	Report Significant Non-Compliers (SNC) within compliance monitoring program.	2020 Status:

	inspected sites will be in full compliance, under an accepted compliance commitment agreement, or referred for formal enforcement within 180 days of inspection date. E-Enterprise Goal: #2			2021 Status:
		Greg Richardson/ Mardi Klevs EPA	Assess and report environmental benefits that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc.	2020 Status: 2021 Status:
	Ensure proper closure and post-closure of all inactive hazardous waste landfills. E-Enterprise Goal: #2 E-Enterprise: Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.	Rob Watson/Scott Ireland EPA	Report % of Government Performance Results Act (GPRA) Baseline Post-Closure Universe facilities brought under control. Illinois EPA: 100% (56 out of 56) of the sites in the RCRA Post-Closure Universe are considered to be under control. Illinois EPA will continue to monitor all of the sites to ensure they remain under control.	2020 Status: 2021 Status:
	Ensure groundwater monitoring at permitted facilities that treat, store and dispose of hazardous waste. E-Enterprise Goal: #2 E-Enterprise: 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.	Michael Summers/ Scott Ireland EPA	USEPA: Report % of hazardous waste management facilities conducting detection monitoring and report % of hazardous waste management facilities conducting assessment/compliance monitoring. Illinois EPA: 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.	2020 Status: 2021 Status:
	Routine compliance monitoring activities	Todd Marvel/Mardi Klevs-EPA	IEPA will conduct 11 Compliance Evaluation Inspections (CEI) at Treatment, Storage, Disposal Facilities (TSDFs) in	2020 Status:

	E-Enterprise Goal: #2		the operating TSDf universe each year so that a CEI is conducted at all 21 operating TSDfS once every 2 years.	2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Conduct 12 Operation & Maintenance (OAM) inspections at TSDfS.	2020 Status: 2021 Status:
		James Jennings/Mardi Klevs-EPA	Conduct Financial Record Reviews (FRR) each year at all TSDfS requiring a review.	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Conduct Non-Financial Record Reviews (NRR) at TSDfS and generators as needed.	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Pursuant to the Illinois EPA RCRA Flexibility Plan for FFY 2018, conduct 85 CEIs at large quantity generators (LQG).	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Pursuant to the Illinois EPA RCRA Flexibility Plan for FFY 2018, conduct 235 CEIs at small quantity generators (SQG).	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Conduct CEIs at conditionally-exempt small quantity generators (CESQGs).	2020 Status: 2021 Status:
	Non-routine compliance monitoring activities E-Enterprise Goal: #2	Todd Marvel/Mardi Klevs-EPA	Conduct citizen complaint investigations as needed.	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Conduct follow-up inspections (FUI) as needed.	2020 Status: 2021 Status:
	RCRAInfo Data Management E-Enterprise Goal: #2	Todd Marvel/Scott Ireland-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	2020 Status: 2021 Status:

			update implementer-owned codes in the RCRAInfo lookup tables, will keep the RCRA program universe records current, and will submit 2019 Biennial Report files in accordance with data quality and timeframe guidelines established by EPA's Office of Resource Conservation and Recovery.	
	Oversight Arrangement E-Enterprise Goal: #2	Todd Marvel/Mardi Klevs-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.	2020 Status: 2021 Status:
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.	2020 Status: 2021 Status:
		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).	2020 Status: 2021 Status:
		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)	2020 Status: 2021 Status:
		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.	2020 Status: 2021 Status:

		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>	<p>2020 Status:</p> <p>2021 Status:</p>
	E-Enterprise Goal: #2	Bur Filson/Stephan Jann-EPA	Illinois EPA will provide updates and add new data to the national UIC database at least twice per year, (switching to the replacement method of electronic reporting once on-line) April 15 and October 15, to satisfy the reporting needs formerly met through the submission of the 7520s and inventory.	<p>2020 Status:</p> <p>2021 Status:</p>
Strategic Goal 3: Greater Certainty, Compliance and Effectiveness				
Strategic Objective 3.2: Create Consistency and Certainty				
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	<p>Number of CA 2020 GPRA baseline facilities with human exposures under control</p> <p>E-Enterprise Goal: #2 E-Enterprise: Update Illinois EPA and federal databases available to the</p>	Rob Watson/Jose Cisneros-EPA	<p>Take necessary actions to help Region 5 to achieve FY20/21 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for.</p> <p>FFY 2020: Illinois EPA will attempt to perform 1 additional CA725 determination.</p>	<p>2020 Status:</p> <p>2021 Status:</p>

	public sector, government agencies, and the regulated community.		FFY 2021: Illinois EPA will attempt to perform 1 additional CA725 determination.	
Joint Priority	Number of CA 2020 GPRA baseline facilities with migration of contaminated groundwater under control E-Enterprise Goal: #2	Michael Summers/ Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FY20/21 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for. FFY 2020: Illinois EPA will attempt to perform 1 additional CA750 determination. FFY 2021: Illinois EPA will attempt to perform 1 additional CA750 determination.	2020 Status: 2021 Status:
Joint Priority	Number of CA 2020 GPRA baseline facilities with remedy construction complete E-Enterprise Goal: #2 E-Enterprise: Update Illinois EPA and federal databases available to the public sector, government agencies, and the regulated community.	Rob Watson/Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FY20/21 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for. FFY 2020: Illinois EPA will attempt to perform 1 additional CA550 determination. FFY 2021: Illinois EPA will attempt to perform 1 additional CA550 determination.	2020 Status: 2021 Status:
Joint Priority	Number of CA2020 GPRA baseline facilities that are ready for anticipated use	Rob Watson/Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FY20/21 GPRA goals for the 126 of 152 sites that Illinois EPA is responsible for. FFY 2020: Illinois EPA will attempt to perform 1 additional CA800 determination.	2020 Status: 2021 Status:

			FFY 2021: Illinois EPA will attempt to perform 1 additional CA800 determination.	
Joint Priority	Number of CA2020 GPRA baseline facilities at which performance standards have been attained	Rob Watson/Jose Cisneros-EPA	Take necessary actions to help Region 5 to achieve FY20/21 GPRA goals for the 126 of 152 CA900/999 sites that Illinois EPA is responsible for. FFY 2020: Illinois EPA will attempt to perform 1 additional CA900/999 determination. FFY 2021: Illinois EPA will attempt to perform 1 additional CA900/999 determination.	2020 Status: 2021 Status:
Strategic Goal-1: A Cleaner, Healthier Environment				
Strategic Objective 1.4: Ensure Safety of Chemicals in Marketplace				
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 E-Enterprise Goal: #1	Beth Unser/Mardi Klevs-EPA	Conduct routine TSCA inspections statewide as mutually agreed. Illinois EPA will perform 17 PCB inspections each year for FY20/21. Inspections will be targeted according to joint inspection priorities determined by Illinois EPA and USEPA.	2020 Status: 2021 Status:
		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.	2020 Status: 2021 Status:
		Beth Unser/Mardi Klevs-EPA	Provide timely response to any tip or complaint regarding PCBs.	2020 Status: 2021 Status:

		Beth Unser/Mardi Klevs-EPA	Provide oversight of PCB remediation activities that require additional support, compliance assistance or sampling.	2020 Status: 2021 Status:
Work Plan Outputs/Measures/Outcomes – Enforcement and Rules Development/Authorization				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.801	Enforcement and Rules Development Activities	Dan Merriman/ Mardi Klevs-EPA	Report number of referrals to Illinois EPA’s Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases).	2020 Status: 2021 Status:
		Todd Marvel/Mardi Klevs-EPA	Illinois EPA will submit Authorization Revision Applications (ARA) 10, which will include all applicable RCRA rules promulgated to date.	2020 Status: 2021 Status:

Attachment C: Bureau of Water

Illinois Environmental Protection Agency 2020/2021 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 1: A Cleaner, Healthier Environment				
Strategic Objective 1.2: Provide for Clean and Safe Water				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Number of CWSs out of compliance with health-based drinking water standards	Mary Reed/ Jeri Long	In FY2020 and FY21, reduce the number of community water systems out of compliance with health-based drinking water standards. EPA and the State will work collaboratively to implement the national measure and national compliance initiative (NCI) goal to reduce by 25%, by the end of FY 2022, the number of CWSs that are out of compliance with health-based standards.	2020 Status: 2021 Status:
	Percent of community water systems where risk to public health is minimized through source water protection.	Rick Cobb/ Anthony Dulka	In FY2020 and FY21, 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).	2020 Status: 2021 Status:
	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Rick Cobb/ Anthony Dulka	By FY2020 and FY21, 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).	2020 Status: 2021 Status:
	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim	Steve Vance	In FY2020 and FY21, 79% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.	2020 Status: 2021 Status:

	Enhanced and Long Term 1 Surface Water Treatment and Groundwater Rules.			
Strategic Goal 1: A Cleaner, Healthier Environment				
Strategic Objective 1.2: Provide for Clean and Safe Water				
Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
Clean Water Action Plan		Amy Dragovich	<u>Combined Sewer Overflow (CSO) Permits:</u> Illinois EPA will send an update of CSO permits to Region 5 on a semi-annual basis. Illinois EPA will update USEPA CSO LTCP status spreadsheet, and track progress toward meeting goals under the CSO Control Plan Policy.	2020 Status: 2021 Status:
Strategic Goal 1: A Cleaner, Healthier Environment				
Strategic Objective 1.2: Provide for Clean and Safe Water				
Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
		Christine Davis/ Trevor Sample	<u>Illinois Nutrient Loss Reduction Strategy (NLRS):</u> Illinois EPA, will continue to collaborate with the Illinois Department of Agriculture and a broad range of stakeholders to implement the NLRS. <ul style="list-style-type: none"> • A biennial report, which also serves to update the NLRS will be developed and provided to USEPA in FY21. • A NLRS Workshop will be held in FY21. 	2020 Status: 2021 Status:
	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,	Scott Twait	In early 2020, the Illinois EPA will review the recommendations of its Science Panel. Based on this information, in late 2020 or early 2021, Illinois EPA will work with Region 5 to access the utility of NSAC recommendation for numeric nutrient criteria to protect aquatic life and recreation uses throughout Illinois.	2020 Status: 2021 Status:

	reservoirs/streams, and estuaries, based on a full set of performance milestone information supplied annually by states and territories.			
	Number and national percent of states & territories that within the preceding 3-year period, submitted new or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.	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 recommendations to assist such facilities to comply with the future ammonia water quality standard.	2020 Status: 2021 Status:
	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"> • Ambient Water Quality Monitoring Network activity at 146 ambient stream stations. • 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 http://www.epa.state.il.us/water/water-quality/monitoring-strategy/monitoring-strategy-2015-2020.pdf). • Facility-Related Stream Survey activity at up to five facilities. • Ambient Lake Monitoring Program activity at approximately 25-40 lakes. 	2020 Status: 2021 Status:

			<ul style="list-style-type: none"> • Lake Michigan Monitoring Program activity at approximately 25 nearshore survey sites, 2-3 Lake Michigan harbors, and 3-4 public water supply intakes. • Special Monitoring Survey activity for NPS/watershed, permitting, or other program on an as-needed basis. • Fish Contaminant Monitoring Program sample analysis activity. • AWQMS/STORET database management activity and regular updates. • 2020 Integrated Report submitted by 4/1/2020; draft 2022 Integrated Report by 7/30/2021. 	
	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 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.	Christine Davis/ Abel Haile	<p>Illinois EPA will continue implementation of the Vision accepted by USEPA in 2015. TMDLs will be primarily funded with, or used as match for, CWA Section 319 funds.</p> <ul style="list-style-type: none"> • TMDLs will include implementation plans that meet the criteria for a nine-element watershed-based plan or will be accompanied by an implementation plan that meets the nine elements. • TMDLs or alternatives started in FY18 will be completed in FY20. TMDLs started in FY19 will be completed in FY21. • Illinois EPA will provide draft TMDLs, and checklist identifying where the report meets each element, to Region 5 for review and comment at least 30 days prior to public notice, or alternative timeframe as agreed upon. • TMDL development will be tracked for progress and reported in the NPS Program annual report. 	<p>2020 Status:</p> <p>2021 Status:</p>
	Nonpoint Source Management Program and CWA Section 319 Grant Program	Christine Davis	Illinois EPA will continue to implement the Illinois Nonpoint Source Management Program. Priority will be given to expand the implementation of existing watershed-based	<p>2020 Status:</p> <p>2021 Status:</p>

			<p>plans (WBP), the development of new WBPs, and the update of WBPs 10 years or older.</p> <ul style="list-style-type: none"> • Annual NPS Program reports required as a condition of 319 grant awards shall, in addition to 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). • Illinois EPA will submit annual NPS workplans consistent with the EPA's Final NPS Program and Grants guidelines for States and Territories, and will act to award 319 grants in accordance with the following schedule: <ul style="list-style-type: none"> • August 1: State competitive subgrant solicitation closes, evaluation begins • November 1: State NPS draft workplan due to EPA including subgrants proposed for funding • December 31: EPA comments on draft workplan to State • January 31: State responds to EPA comments • February 28: State sends full application to EPA • April 30 or as funds received from Congress: Grant award • Illinois EPA will complete a minimum of one US EPA approved 319 success story per year to demonstrate progress towards reaching the goals of the Illinois' Nonpoint Source Management Program. 	
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year	Jim Miles/CAS	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 four-quarter SNC rate baseline of 29.4% to 22.1% by the end of FY2020 and 18.5% by the end of FY2021.	<p>2020 Status:</p> <p>2021 Status:</p>

		Jim Miles/CAS	In accordance with the NPDES Electronic Reporting Rule, IEPA will share Phase 1 data electronically with EPA. The Phase 1 data that will be shared with EPA includes permit, compliance monitoring (e.g., inspection), violation determination, and enforcement action data.	2020 Status: 2021 Status:
Small Systems Strategy		Jim Miles/CAS	IEPA will implement a Small System Strategy-Compliance Assistance Program on a minimum of 5 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.	2020 Status: 2021 Status:
Clean Water Action Plan	Resolve State Review Framework items	Jim Miles/CAS	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO and other violations of environmental regulations. On an annual basis provide the number of Violation Notices and Referrals for NPDES, Stormwater, SSO/CSO and CAFO violations.	2020 Status: 2021 Status:
		Jim Miles/CAS	Illinois EPA and USEPA Region 5 will coordinate compliance and enforcement activities to avoid duplication. Region 5 conducts inspections to implement national compliance initiatives and other regional priorities. Region 5 will coordinate with Illinois EPA on regional activities (i.e., CWA NPDES SNC National Compliance Initiative (NCI)).	2020 Status: 2021 Status:
		Jim Miles/CAS	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).	2020 Status: 2021 Status:
	Permit Activities	Amy Dragovich	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 FY20/21.	2020 Status: 2021 Status:

		Amy Dragovich	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.	2020 Status: 2021 Status:
		Amy Dragovich	<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; and EPA meeting its goal of reviewing selected proposed permits within 45 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>	2020 Status: 2021 Status:
	Number of high priority State NPDES permits that are issued in the fiscal year	Darin LeCrone	Develop new priority permit lists for FFY2020 and 2021 in conjunction with Region 5 as soon as practicable near the end of each Federal fiscal year for the upcoming year. The list of permits will include one or more of the issues of wet	2020 Status: 2021 Status:

			weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years. Issue 100% of the identified priority permits by the end of each FFY.	
		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.	2020 Status: 2021 Status:
		Amy Dragovich	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 45 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.	2020 Status: 2021 Status:
Joint Priority	Concentrated Animal Feeding Operation (CAFO) Program	Jim Miles/ Julianne Socha	<u>Work Plan Agreement:</u> Illinois EPA and Region 5 will continue to implement the 9/5/2014 Work Plan Agreement for Calendar Years 2020-2021.	2020 Status: 2021 Status:
		Jim Miles/ Julianne Socha	<u>CAFO Inventory and Inventory Updates:</u> Within 120 days of the effective date of this PPA, Illinois EPA will submit a revised CAFO Inventory SOP based on current practices for Region 5 review. Region 5 will review the revised CAFO Inventory SOP within 60 days. Illinois EPA will maintain and update the CAFO Inventory in accordance with the CAFO Inventory SOP approved by Region 5. Annually, by the 28 th of February, Illinois EPA will provide an updated CAFO Inventory to Region 5. Illinois EPA will make the CAFO inventory available to the public in accordance with the approved CAFO Inventory SOP.	2020 Status: 2021 Status:
		Darin LeCrone/ Julianne Socha	<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 by the 10 th of October. Submit CAFO permit numbers for each calendar year in response to annual request from Permits Branch, Water Division, Region 5.	2020 Status: 2021 Status:

		Darin LeCrone/ Julianne Socha	Illinois EPA will submit a revised pre-public notice draft general permit review package to Region 5 by November 18, 2019. Region 5 will review and provide Illinois EPA comments within 45 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. Illinois EPA will initiate public notice of the draft general permit no later than 60 days following receipt of USEPA comments. Within 150 days after the close of the public comment period or hearing, whichever comes later, Illinois EPA will provide the proposed permit and Illinois EPA's response to comments for review by Region 5. Illinois EPA will issue a final permit within 30 days after receiving a letter from EPA under 40 CFR 123.44, provided that the letter does not communicate a general or specific objection to the proposed permit.	2020 Status: 2021 Status:
		Jim Miles/ Cheryl Burdett	<u>CAFO Field Procedures Manual</u> : Within 60 days of the effective date of this PPA, USEPA will provide comments to Illinois EPA on the February 2013 CAFO Field Procedures Manual to address current practices. Within 60 days of receipt of USEPA comments, Illinois EPA will submit a revised CAFO Field Procedures Manual for USEPA review and approval.	2020 Status: 2021 Status:
		Jim Miles/CAS	<u>BOW Enforcement Response Guide (ERG)</u> : Within 60 days of the effective date of this PPA, USEPA will provide comments to Illinois EPA on the October 2013, BOW Enforcement Response Guide to address Illinois EPA's enforcement authority. Within 90 days of receipt of USEPA comments, Illinois EPA will submit a revised BOW Enforcement Response Guide for USEPA review and approval.	2020 Status: 2021 Status:
		Jim Miles/CAS James Coleman/ Cheryl Burdett	Illinois EPA will address noncompliance at CAFO/AFOs in accordance with Illinois EPA BOW Enforcement Response Guide. In order to access timely and appropriate enforcement, Illinois EPA will report to USEPA on a semi-	2020 Status: 2021 Status:

			<p>annual basis (by April 15, and October 15) the number and names of CAFO/AFO facilities from the preceding reporting period with:</p> <ul style="list-style-type: none"> • inspections conducted; • identification of which inspections were conducted at previously uninspected facilities • permit/discharge determinations; • violations found (Single Event Violations - SEVs); • SEVs in SNC; • enforcement actions issued (VNs, CCA's); • referrals; • court orders; • penalty amounts; and • a summary of <ul style="list-style-type: none"> ○ CCAs since Jan 1, 2018; ○ Subset of those CCAs that returned to compliance; ○ # of those CCAs closed; and ○ # and names of facilities that are not in compliance with CCAs. 	
		Jim Miles/ Cheryl Burdett/ Julianne Socha	By April 15, and October 15, Illinois EPA will provide USEPA with the inspection reports and CAFO/AFO Status determinations for each inspection/determination completed in the previous six-month period.	<p>2020 Status:</p> <p>2021 Status:</p>
		Jim Miles/ James Coleman	<p><u>USEPA Oversight Inspections:</u> USEPA may conduct AFO/CAFO oversight inspections annually selecting from Illinois EPA's list of previously completed AFO/CAFO inspections. Illinois EPA will provide the list of AFO and CAFO inspection completed in FY 2019 by January 15, 2020. By January 31, 2020, USEPA will select 25 facilities and Illinois EPA will send USEPA the 25 completed AFO/CAFO inspection reports and CAFO Status determination by February 15th. USEPA will review this list to identify its oversight inspection for FY 2020. USEPA will provide copies of the final oversight inspection reports to Illinois EPA within 70 days of the completed inspection.</p>	<p>2020 Status:</p> <p>2021 Status:</p>

		Jim Miles/ Cheryl Burdett	Newly hired inspectors will complete the CAFO/AFO training curriculum prior to conducting inspections independently. Included in 2020 and 2021 PPA Status report, Illinois EPA will provide a list of new hires, date of hire, and date training curriculum was completed, and date of first CAFO/AFO inspection.	2020 Status: 2021 Status:
		Jim Miles/ James Coleman	All staff, including new hires working on AFO/CAFO issues will be trained on the October 2013 Illinois EPA Bureau of Water (BOW) Enforcement Response Guidance (ERG) and any subsequently agreed to ERG. Included in 2020 and 2021 PPA Status report, Illinois EPA will provide the date of training on the ERG and the names of staff who completed the training on that date.	2020 Status: 2021 Status:
		Darin LeCrone/ Jim Miles/CAS James Coleman	Illinois EPA and USEPA will hold quarterly calls to discuss CAFO Work Plan actions items, CAFO permit activity, and CAFO/AFO compliance and enforcement activity.	2020 Status: 2021 Status:
		Darin LeCrone/ Jim Miles/ James Coleman	Submissions regarding CAFO/AFO activity in this document will be deemed submitted on the date they are sent electronically. USEPA may approve or disapprove the submissions, in whole or in part. If USEPA approves the submission(s), USEPA will notify Illinois EPA in writing by mail or email, within 60 days of receipt of the document. The items approved are effective upon approval and, as appropriate, Illinois EPA will immediately implement any procedures included in approved submission. If USEPA disapproves a submission(s), USEPA will notify Illinois EPA in writing within 60 days either by mail or email, and USEPA may require Illinois EPA to supplement or modify the item(s). Within 30 days following a disapproval, Illinois EPA will provide a revised submission to EPA for EPA review and approval. In the event, USEPA disapproves the revised submission, EPA branch and Illinois section management will resolve the disapproval within 60 days. If the USEPA branch and Illinois EPA section management cannot reach an	2020 Status: 2021 Status:

			agreement, this unresolved matter will be raised to USEPA and Illinois EPA division management for resolution.	
	Inspections E-Enterprise Goal: 2	Jim Miles/ James Coleman	<u>Inspection Strategy:</u> A draft CMS plan, will be sent to Region 5 by September 15 each year and will include projections (universe estimates and annual commitments) with adequate detail to support the rationale for any alternate approach proposed. Based on Illinois NPDES program delegation, Illinois EPA is responsible for submitting a CMS plan which covers the following NPDES sources: Majors, Traditional Non-majors, Sewage Sludge/Biosolids, Combined and Sanitary Sewer Systems, MS4, Industrial and Construction Stormwater, Large and Medium Permitted CAFOs, Large unpermitted CAFOs, Medium AFOs without NPDES permits, and small AFOs. Region 5 will comment on the Illinois EPA CMS plan within 30 days after submittal. A final CMS plan will be established once USEPA and Illinois EPA agree on an acceptable plan.	2020 Status: 2021 Status:
	Inspections	Jim Miles/ James Coleman	Under the CAFO program, Illinois EPA will commit to 30 inspections annually at previously uninspected large CAFO facilities until completed. Based on these inspections, a determination will be documented and include whether discharges were observed and Illinois EPA's determination as to whether a permit is required.	2020 Status: 2021 Status:
	Inspections	Jim Miles/ James Coleman	Under the CAFO program, Illinois EPA will commit to 60 inspections annually at previously uninspected medium AFOs until all medium AFOs have been assessed. Each assessment will be documented and include the size of the facility, whether discharges were observed and Illinois EPA's determination as to whether each facility is a CAFO and whether a permit is required.	2020 Status: 2021 Status:
	Inspection Reporting	Jim Miles/ James Coleman	Compliance monitoring activities conducted pursuant to the CMS must be reported into ICIS-NPDES. By June 30, 2020, Illinois EPA will update ICIS with large CAFO facility inspections completed to date (408) and will enter new	2020 Status: 2021 Status:

			inspections within 45 days after the inspection. By July 15, 2020, Illinois EPA will submit the standard ICIS report titled "CAFOs – Large CAFOs without NPDES Permits CMS 2.D.2." to Region 5 for the large CAFO inspections that Illinois EPA submitted into ICIS and affirm whether it includes all inspections completed at large CAFOs.	
	Inspection Reporting	Jim Miles/ James Coleman	Compliance monitoring activities conducted pursuant to the CMS must be reported into ICIS-NPDES. By September 30, 2020, Illinois EPA will update ICIS with medium CAFO facility inspections completed to date (97) and will enter new inspections within 45 days after the inspection. By October 15, 2020, Illinois EPA will submit the standard ICIS report titled "CAFOs – Medium AFOs without NPDES Permits CMS 2.D.3" to Region 5 for the medium inspections that Illinois EPA submitted into ICIS and affirm whether it includes all inspections completed at medium AFOs/CAFOs.	2020 Status: 2021 Status:
		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.	2020 Status: 2021 Status:

FEDERAL FISCAL YEAR (FFY) 2020 ILLINOIS EPA PUBLIC WATER SYSTEM SUPERVISION (PWSS) PROGRAM GRANT WORK PLAN TO FULFILL

PRIMARY ENFORCEMENT AUTHORITY

October 1, 2019 through September 30, 2020

Illinois EPA has primacy for the Illinois Public Water System Supervision (PWSS) program. However, Illinois EPA only directly administers PWSS for community water supply systems and the Illinois Department of Public Health (IDPH) has the responsibility for non-community water supply systems under a Memorandum of Understanding (MOU) with Illinois EPA. U.S. EPA Region 5 provides PWSS grant funds exclusively to Illinois EPA as the primacy agency. Under the MOU with IDPH, Illinois EPA provides funding to the IDPH Drinking Water Program.

Region 5 provided FY 2020 PWSS program work plan guidance to the state drinking water program directors on May 28, 2019. For Illinois, the annual PWSS grant workplan includes state-specific priorities and core program activities for both the Illinois EPA's Community Water Supply (CWS) Program and the IDPH Non-Community Water System (NCWS) Program.

EPA Strategic Plan: 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. Table 1 includes the projected measures for Illinois in FY 2020. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems (PWSs) 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 PWSs on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations. The Region will also oversee activity commitments under the Illinois Program Review Corrective Action Plan developed as a result of the 2018 Program Review.

States which meet the primacy requirements under 40 C.F.R. Part 142, are the primary regulators of drinking water systems in their states. U.S. EPA provides oversight of the implementation of state programs. Region 5 works with each primacy state to develop an annual work plan¹ that promotes collaborative inter-agency program planning and implementation as well as a clear understanding of both state and U.S. EPA commitments. In addition, Region 5 periodically evaluates the implementation and enforcement of public drinking water standards at a programmatic level in all primacy states. Such a program review includes collection, analysis and interpretation of data, with recommendations by U.S. EPA to improve the state drinking water program's effectiveness.

Joint Priorities: Illinois EPA and Region 5 have identified the following Joint Priorities for FY2020-2021:

- **Drinking Water Primacy Agency Staffing Levels:** Ensure Illinois EPA's PWSS Primacy Program maintains adequate numbers of staff to effectively oversee all PWSs in IL. Illinois EPA implements the PWSS program for community water supply wells and ensures primacy requirements are met and adequate staff are available for the non-community program administered by the IDPH. Over the period covered by this agreement, the Illinois EPA-Bureau of Water, with support from U.S. EPA Region 5 GWDWB, will develop a strategy to maintain a baseline core of individuals who have the technical expertise needed to implement PWSS programs, particularly for the non-community program. U.S. EPA and Illinois EPA will meet at least quarterly to discuss the progress of hiring new staff as well as the primacy agency's plan to maintain the baseline level of staff over the next five years.

¹ In addition to the annual workplan, the state needs to submit the required grant application materials, including the appropriate application forms, a full budget including match funding, a budget narrative, and the appropriate certifications, as described in statutes (i.e., CFR Part 35) and EPA guidance, as found at <https://www.epa.gov/grants/epa-grants-policy-resources>.

- **Drinking Water Technical Assistance:** U.S. EPA will provide training and technical assistance related to lead in drinking water issues.
- **Drinking Water System Risks from Harmful Algal Bloom (HAB) Toxins:** Illinois EPA and U.S. EPA will coordinate activities to assist water systems in evaluating risks from Harmful Algal Bloom (HAB) toxins. Illinois EPA has implemented a HAB monitoring strategy that includes evaluating toxin break-through of the water treatment process.
 - In FFY 2020-2021, Illinois EPA will continue to monitor HAB toxins from up to 1/5 of the water supplies utilizing inland lakes as their source of water.
 - U.S. EPA Region 5's Laboratory will assist Illinois EPA by conducting confirmatory analyses by GC/MS/MS of HAB toxins detected in screening analyses by the ELISA method for finished water samples collected from community water supplies.

Contacts:

- Rick Cobb, Acting Division of Public Water Supplies Manager, rick.cobb@illinois.gov, 217-782-1020
- Cynthia Meyer, U.S. EPA Region 5 Illinois State Program Manager, meyer.cynthia@epa.gov, 312-886-5868

Federal Funding Used:

Illinois EPA receives funding from the PWSS grant and provides about \$800,000 per year to IDPH under the MOU. Illinois EPA is also receiving funds under the DWSRF Small Systems Technical Assistance Set-Aside for FY2019 & FY2020 for the IL Rural Water Association to provide technical assistance and training to community water systems to more efficiently operate and maintain their systems. Illinois EPA also receives Clean Water Act Section 106 funds for groundwater protection and nutrient loss reduction strategy. Another Clean Water Act 106 grant will be used for a PFAS assessment and interpretive report and a multipurpose grant has been awarded to assist with PFAS follow-up assessment beyond the statistical occurrence monitoring.

1. Status of Rule Adoption and Implementation

- Illinois EPA has primacy for implementing the National Primary Drinking Water Regulations (NPDWRs) and implements the safe drinking water statutes and rules on which primacy is based.
- U.S. EPA and Illinois EPA expect a priority area of focus will continue to be the public health concerns related to Lead and Copper Rule (LCR) implementation. As such, Illinois EPA and IDPH will continue to provide information regarding lead action level exceedances annually to U.S. EPA Region 5.
- Specific state compliance targets are included in the Measures and Indicators, Table 1.
- U.S. EPA and Illinois EPA will conduct Fourth Unregulated Contaminant Monitoring Rule – Fourth Round (UCMR4) activities as described in the U.S. EPA/Illinois EPA UCMR Partnership Agreement.
- Illinois EPA and IDPH will update the status of FY2020 state activities conducted under the Program Review Corrective Action Plan at least semi-annually.
- U. S. EPA is working with Illinois EPA and IDPH to approve the Revised Total Coliform Rule (RTCR) regulations for primacy, particularly for the non-community program implementation.

2. Sanitary Surveys

- Illinois EPA and IDPH will maintain technical expertise needed to perform sanitary surveys and ensure that sanitary surveys meet the content and frequency requirements specified by the regulations. During the FY 2020 grant year, Illinois EPA will complete 495 CWS sanitary surveys.
- During the FY 2020 grant year, IDPH will complete around 1800 sanitary surveys at all licensed recreational areas and all biennial surveys that are due to be completed.

- Illinois EPA and IDPH will also evaluate all eight elements and report status quarterly to SDWIS-FED. IDPH is fully implementing the appropriate tracking and reporting of the eight elements of a sanitary survey.
- U.S. EPA Region 5 will track state targets to conduct sanitary surveys for all system types within the federally required intervals.

3. Enforcement

- Illinois EPA and IDPH will maintain an adequate enforcement and compliance assistance program.
- Illinois EPA and IDPH will continue to address systems not in compliance with state rules, and report enforcement actions quarterly to U.S. EPA, via SDWIS-FED.
- Illinois EPA and IDPH will continue to refer noncompliant PWSs to U.S. EPA Region 5 for follow-up action, if appropriate.
- Illinois EPA will submit an Annual Compliance Report (ACR) to U.S. EPA annually by July 1st. The Illinois ACR is part of the Annual Consolidated Report.

4. Capacity Development, Small System Support, and DWSRF Program Integration

- Illinois EPA and IDPH will continue assisting existing PWSs in acquiring and maintaining technical, managerial and financial (TMF) capacity. Further, Illinois EPA and IDPH will require new PWSs to demonstrate they have the TMF capacity to operate in compliance with federal and state regulations.
- Illinois EPA will continue to submit the annual State Capacity Development Program Report as part of the Annual Consolidated Report on behalf of all water system types. This report includes a list of new PWSs within the last three years and indicates if they had an Enforcement Targeting Tool (ETT) score of 11 or greater. Also, the Capacity Development Governor's Report is due every 3 years and is due next by October 1, 2020.
- In FY2020, Illinois EPA and IDPH will continue with the specific activities planned to use PWSS grant funds for capacity development and small system support

5. Operator Certification and DWSRF Program Integration

- Illinois EPA and IDPH will continue to maintain regulations for the operation and maintenance of PWSs by properly certifying individuals.
- Illinois EPA will continue to report to U.S. EPA, on an annual basis, on how all water system types are implementing an Operator Certification Program that complies with the U.S. EPA's Operator Certification Guidelines, including the nine baseline standards.

6. Data Management and Reliability

- During FY20, Illinois EPA and IDPH will maintain adequate data management systems (and update them for new rules and new versions of FedRep, if made available) that track reporting requirements for all rules using SDWIS/State. Illinois EPA does not anticipate undertaking, however, any SDWIS-Prime. SDWIS Prime is now being called SDWIS Modernization. U.S. EPA contractors are reviewing to even see if any of SDWIS Prime is salvageable.
- Illinois EPA and IDPH will report in a timely manner to U.S. EPA actions and sample data quarterly and inventory data at least annually, in accordance with 40 CFR 142.15.
- Illinois EPA and IDPH will correct errors identified on the FedRep ODS error reports or identified by the Region in a timely manner. i.e., errors are corrected either in the quarter first identified by the Region or first appear on the SDWIS/Fed ODS error reports, or the next quarter.
- Illinois EPA and IDPH will implement the Corrective Action Plan once finalized to address all deficient violation reporting issues per the agreed upon schedule.

- IEPA has completed the programming and has been fully reporting RTCR violations, including Level 1 and Level 2 assessments to SDWIS/State. IDPH has not yet completed programming to be able to fully report RTCR violations, including Level 1 and Level 2 assessment information, to SDWIS/State. Under the 2017 Illinois Joint Review and Enforcement Verification Correction Action Plan, IDPH has committed to assigning RTCR violations by October 1, 2020.
- Illinois IDPH will explore ways to expedite complete and accurate reporting to SDWIS/Fed.

7. Source Water Protection

- Illinois EPA will continue to report annually progress toward source water protection measures and targets for FY2020.

8. Laboratory Certification

- Illinois EPA and IDPH will continue to provide an adequate laboratory certification program for all regulated contaminants, at a minimum; to certify commercial laboratories at least once every three years; ensure capacity to analyze at the principal state laboratory or commercial labs all NPDWR parameters that are required to be sampled in the State; and maintain certification for the principal state labs.
- Illinois EPA and IDPH Lab Certification Programs will continue to submit annual questionnaires to U.S. EPA Region 5.

9. Security/America's Water Infrastructure Act (AWIA)

- States with Primacy are required to ensure that community water supplies (CWSs) maintain an adequate plan for the provision of safe drinking water under emergency circumstances.

Other Activities:

- **PFAS:** Illinois is implementing a statistically based monitoring program with community and groundwater sources and surface water intakes. The funding for the statistical monitoring is from Illinois EPA (state funds), the USGS interpretative report is funded by the Clean Water Act 106 funds and any follow up will be paid for using Multi-Purpose Grant funds.
- **HABs:** Illinois has implemented a HAB monitoring strategy that includes evaluating toxin break through from the water treatment process.
- **Environmental Justice:** Illinois EPA is working with Cicero / Berwyn and University Park to address lead issues in drinking water.
- **Lead Beyond the Federal Rules:** Illinois EPA is setting up a more robust monitoring schedule and requiring sequential monitoring. IDPH requires lead testing in all school and daycares and requires mitigation plans.

Table 1
Table of FY20 National/Regional/State Measures

Description	Name and update schedule	Target
Number of CWSs out of compliance with health-based drinking water standards: U.S. EPA and the State will work collaboratively to implement the national measure and national compliance initiative (NCI) goal to reduce by 25%, by the end of FY 2022, the number of CWSs that are out of compliance with health-based standards.	USEPA	State FY20 target: 13 out of 1,758 systems
Percent of CWSs and NCWSs with sanitary surveys within the past three or five years as required	R5 - Updated by Region 5 in April and October	State FY20 targets: 79.5% CWSs 97.5% NCWSs
Percent of CWSs where risk to public health is minimized through source water protection	R5 SWP Program measure	State FY20 target: 50% CWS systems
Percent of population served by CWSs where risk to public health is minimized through source water protection	R5 SWP Program measure	State FY20 target: 72.6 % population served by CWS systems
All Rule Violation Completeness Reporting	R5 High Priority: Updated quarterly by Region 5	State FY20 target: N/A for FY20; will establish a baseline
1. % of <u>CWS systems</u> meeting all health-based standards	Shared Goals: Updated annually in April by Region 5	CY19: ≥95%
2. % of <u>population</u> of CWSs meeting all health-based standards	Shared Goals: Updated annually in April by Region 5	CY19: ≥95%
3. % of <u>NTNCWSs</u> meeting all health-based standards	Shared Goals: Updated annually in April by Region 5	CY19: ≥95%
4. % of <u>TNCWSs</u> meeting all health-based standards	Shared Goals: Updated annually in April by Region 5	CY19: ≥95%
5. % of <u>population</u> served by CWSs with <u>significant /major monitoring violations</u>	Shared Goals: Updated annually in April by Region 5	CY19: <5%
6. % of <u>CWS systems</u> with <u>significant /major monitoring violations</u> (includes LCR Type 66 violations)	Shared Goals: Updated annually in April by Region 5	CY19: <10%
7. % of <u>NTNCWSs</u> with significant/major monitoring violations for <u>acute</u> health risks	Shared Goals: Updated annually in April by Region 5	CY19: <5%
8. % of <u>NTNCWSs</u> with significant/major monitoring violations for <u>chronic</u> health risks	Shared Goals: Updated annually in April by Region 5	CY19: <10%
9. % of <u>TNCWSs</u> with significant/major monitoring violations	Shared Goals: Updated annually in April by Region 5	CY19: <10%