



Annual Groundwater and Drinking Water Program Review



Calendar Year 2016

Illinois Environmental Protection Agency

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Review
Calendar Year 2016**

June 2017

**Illinois Environmental Protection Agency
Bureau of Water
Division of Public Water Supplies**

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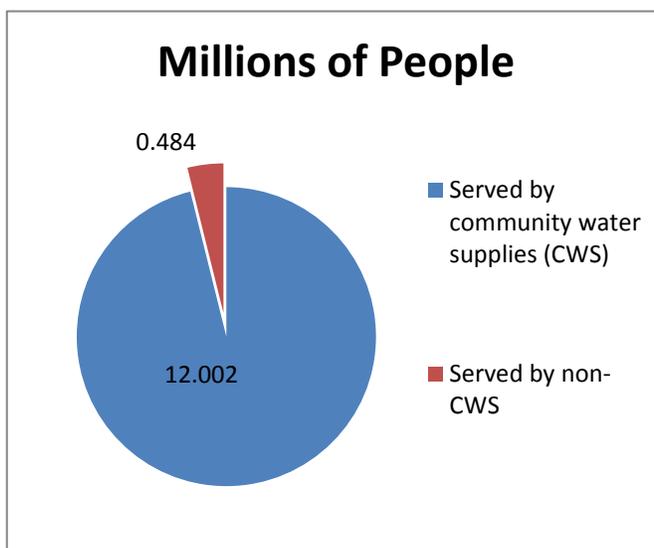
Acronyms and Abbreviations

Act	Illinois Environmental Protection Act
BOW	Bureau of Water
CAS	Compliance Assurance Section
CCA	Compliance Commitment Agreement
CCCDI	Cross-Connection Control Device Inspector
CWS	Community Water Supply
DPH	Department of Public Health
DPWS	Division of Public Water Supplies
EDG	Enforcement Decision Group
EPA	Environmental Protection Agency
FOS	Field Operations Section
GAC	Groundwater Advisory Council
GWS	Ground Water Section
HAB	Harmful Algal Bloom
ICCG	Interagency Coordinating Committee on Groundwater
IFAS	Infrastructure and Financial Assistance Section
IGPA	Illinois Groundwater Protection Act
ILCS	Illinois Compiled Statutes
Ill. Adm. Code	Illinois Administrative Code
IPCB	Illinois Pollution Control Board
JCAR	Joint Committee on Administrative Rules
LHD	Local Health Department
MCL	Maximum Contaminant Level
M&R	Monitoring and Reporting
MRDL	Maximum Residual Disinfectant Levels
NCA	Non-Compliance Advisory
NCPWS	Non-Community Public Water Supply
NTNC	Non-Transient, Non-Community
PS	Permit Section
PWS	Public Water Supply
PWSS	Public Water System Supervision
RO	Regional Office
RTC	Returned to Compliance
RTCR	Revised Total Coliform Rule
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
TNC	Transient Non-Community
VN	Violation Notice

Executive Summary

This report provides information on the efficacy of existing programs to protect and support public water purveyors and groundwater resources in Illinois. This document is intended to identify program stresses and future directions in overcoming existing insufficiencies. Further this report attempts to provide information on anticipated future shortfalls in the regulatory oversight and technical assistance to drinking water systems in Illinois. Finally, this document is intended to meet the reporting requirements of the Safe Drinking Water Act Amendments of 1996 and the Illinois Groundwater Protection Act.

The Illinois Environmental Protection Agency (EPA) regulates 1,742 community water supplies (e.g., municipalities, privately owned utilities, etc.) that serve 12,001,850 individuals. The Illinois Department of Public Health (DPH) regulates 3,755 non-community water supplies (e.g., schools, factories, campgrounds, rest areas, etc.) that serve approximately 484,819 customers. The mission of these two state agencies is to assure that all persons served by public water supplies receive water that is safe and adequate in quantity.



The Illinois EPA, Illinois DPH, and U.S. EPA recognize the importance of an ongoing program to evaluate the sanitary conditions of all public water supplies in Illinois. For the 2014-2016 calendar year timeframe, the Illinois EPA conducted sanitary surveys at approximately 91.3 percent of the community water supplies and the Illinois DPH conducted sanitary surveys at approximately 96.8 percent of the non-community water supplies in the state. Similarly, the Agencies understand the importance of an ongoing program to protect ground and surface water sources of public water supplies. In calendar year 2016, 73.4 percent of the population served by community water systems in Illinois had source water that was substantially protected by their respective water systems, exceeding the U.S. EPA established measure for source water protection programs.

The Governor and General Assembly further understand the importance of well credentialed and properly certified public water supply operators in protecting water consumers. For Calendar Year 2016, there were 3,751 certified community water supply operators (not including 157 operators in training) and 535 certified non-transient non-community water supply (day care centers, schools and factories) operators in Illinois. Expansion of the State's technical capacity (such as the operator in training certification process and revisions to the Public Water Supply Operations Act) remains one of the hallmarks of the drinking water protection program. Further, the Illinois EPA and DPH continue to support the development of financial, managerial capacity in water systems. We continue to look for opportunities to enhance these important elements in the stability of water supplies. Such initiatives as the water loss accounting pilot program will continue

to be given priority to ensure the continued viability of our water systems.

Recognizing the *mission* of the Illinois EPA and DPH, for calendar year 2016, 98.7 percent of the population served by community water supplies and 99.6 percent of the non-community water supplies in Illinois received drinking water that met all applicable health-based drinking water standards.

Core Public Water Supply Supervision (PWSS) Program Grant Activities

In 2016, the Illinois EPA and DPH agreed to:

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that states must expand their labs to perform all the analyses. At a minimum, a state should have an adequate certification program to certify commercial labs within the state.
 - ☞ Illinois EPA provided a certification program for inorganic and organic contaminants of concern.
 - ☞ Illinois DPH provided a certification program for bacteriologic contaminants of concern.
 - ☞ A third party accredited single laboratory in Illinois that conducts radiological analyses for drinking water.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
 - ☞ Illinois EPA utilizes SDWIS/State to manage community water system compliance with all regulatory compliance concerns.
 - ☞ Illinois DPH utilizes a second instance of SDWIS/State to maintain compliance data for regulatory concerns related to federal regulatory requirements for non-community water systems.
- ⇒ Keep adequate records of pertinent state decisions.
 - ☞ The Illinois EPA promulgates regulations through the Illinois Pollution Control Board (PCB) and Joint Committee on Administrative Rules (JCAR). All regulatory decisions are tracked and made part of the public record by these two quasi regulatory/judiciary bodies. All enforcement decisions made by the Illinois EPA are part of the public record and available through Freedom of Information Act request or through the Illinois EPA website (including Illinois EPA's Drinking Water Watch).
 - ☞ The Illinois DPH promulgates regulations through JCAR. All regulatory decisions are tracked and made part of the public record. All enforcement decisions made by the Illinois DPH are part of the public record and available through Freedom of Information Act request or through the Illinois DPH website (including Illinois DPH's Drinking Water Watch).
- ⇒ Adopt all rules in a timely manner (within two-year extension period).

Federal funds provided by the PWSS program currently provide less than 50 percent of the funds used to support the drinking water protection program in Illinois. The remainder of staff resources are provided for by state programs.

- ☞ The Illinois PCB normally adopt identical in substance to Federal Rules twice per year. The Illinois EPA and DPH currently have statutory (enforceable authority) for all Federal Rules.
- ⇒ Notify all systems of regulatory requirements and respond to questions.
 - ☞ The Illinois EPA and DPH provide technical assistance, emergency response and routine sanitary surveys (inspections) for water systems in Illinois. In addition, the two state agencies rarely pass up an opportunity for public outreach. Speaker support is provided to a multitude of state and local organizations including, but not limited to: Illinois Section of the American Water Works; Illinois Rural Water Association; Illinois Potable Water Supply Operator's Association; Illinois Association of Plumbing and Heat/Cooling Contractors; and Regional Water Supply Operator Organizations.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
 - ☞ These data are reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. Most data are reported within statutory timeframes; however, the Illinois EPA and DPH recognize this as an area that needs improvement.
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
 - ☞ As reported previously, both the Illinois DPH and EPA have favorable water supply compliance history and are very active in technical assistance programs throughout the state.
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
 - ☞ Both the Illinois EPA and DPH recognize that staff resources are key components in the sustainability and ultimate viability of the drinking water protection program in Illinois. Reductions in Federal Funding to adequately support the PWSS program as well as limitations in state general revenue funds could impact staff resources in the future.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
 - ☞ The U.S. EPA Region 5, Illinois EPA and DPH will conduct a data and enforcement verification audit in Calendar Year 2017. Further, the Illinois EPA and DPH routinely respond to enforcement tracking inquiries and other program concerns from the U.S. EPA. The U.S. EPA routinely refers water consumer complaints for state assessment and resolution.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.
 - ☞ The Illinois EPA recognizes providing safe drinking water to Illinois citizens is a critical function in the mission of protecting public health and the environment.

¹ C.F.R. 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule requirement for States to report data to the national data base, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. Because States submit their data directly to SDWIS/FED-ODS, U.S. EPA Region 5 allows the States to submit data 60 days after the end of the quarter. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention. The reporting schedule expectation is for States to report data to SDWIS/FED-ODS as follows: FFYQ1 – February 28, FFYQ2 – May 31, FFYQ3 – August 31, and FFYQ4 – November 30.

As such, the Illinois EPA and DPH have not disinvested in Federal or State rules/regulations that serve to ensure that drinking water meets all applicable standards through effective treatment and source water protection. Further, Illinois has continued to adopt state regulations that are identical in substance to federal regulations to assure the continual improvement in health protection is based upon the most current science available at the national level.

Priorities for 2017

The following activities outline the priorities for the Illinois EPA and DPH for Calendar Year 2017:

- Finalize the streamlining of Illinois drinking water regulations and legislation to enhance drinking water protection in Illinois.
- Continue to support statutorily established committees, councils and boards charged with assisting the Illinois EPA and DPH in improving program activities in support of the Agencies' mission.
- Continue to use, support and improve technology, such as the Safe Drinking Water Information System, to track the efficacy of water treatment facilities in protecting water consumers.
- Continue to initiate efforts to enhance the technical, financial and managerial capacity of public water supplies. This priority includes ensuring that the Permitting, Operator Certification, Cross-Connection Control and Source Water Protection Programs remain high priorities in protecting public health and ensuring water system viability.
- Continue to place priority on maintaining current inspection goals and provide emergency and technical assistance to water systems as necessary to maintain Illinois' high public health protection goals.
- Continue to conduct the prevention-oriented programs to protect groundwater required by the Illinois Groundwater and Environmental Protection Acts and recommended by the Interagency Coordinating Committee on Groundwater, Groundwater Advisory Council, and the Priority Groundwater Protection Planning Committees.

PURPOSE OF THIS REPORT

The Illinois EPA and Illinois DPH hope that by making this document available for review the public will have a better understanding of drinking water quality concerns in Illinois. Furthermore, this document is intended to meet several independent reporting requirements of the SDWA Amendments of 1996, serve as the annual self-assessment for the PWSS Grant (which should aid the U.S. EPA Region 5 in oversight of Illinois' primacy programs), as well as reporting requirements of the Act.

First, Section 1414(c)(3) of the Safe Drinking Water Act (SDWA) requires States with primary enforcement authority to prepare, make readily available to the public, and submit to the Administrator of the U.S. EPA by July 1 of each year, an annual report on violations of national primary drinking water regulations by public water systems.

Second, this report is intended to meet the Capacity Development Program reporting requirements of Section 1420 of the SDWA. The SDWA requires annual documentation to the U.S. EPA and triennial reporting to the Governor on the efficacy of Illinois' program with emphasis on improving technical, managerial and financial capacity of public water systems in Illinois.

Third, States are required to adopt and implement an Operator Certification Program for public water supplies. The Guidelines pursuant to Section 1419(b) of the SDWA require the Illinois EPA to provide information to U.S. EPA annually for the purpose of program review.

INTRODUCTION

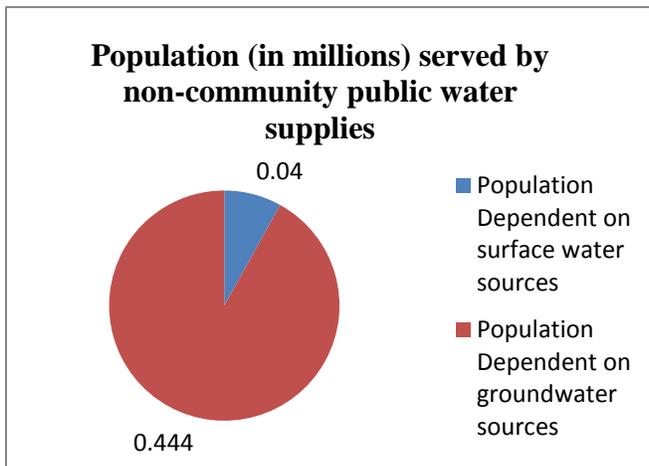
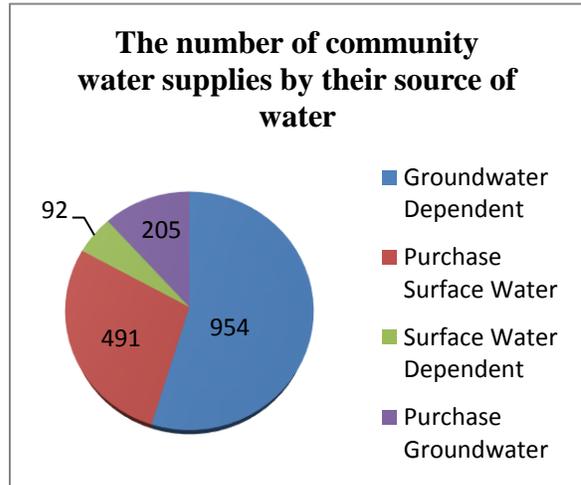
In Illinois, regulatory oversight of public water systems (PWS)² is shared by the Illinois EPA and DPH. The Illinois EPA was designated as Illinois' primary enforcement authority by the U.S. EPA on August 29, 1979. The Illinois EPA, through an Intergovernmental Funding Agreement³ has empowered the Illinois DPH to administer the Non-Community PWS Program while the Illinois EPA retains regulatory authority over Community PWS⁴.

² PWS serve 15 service connections or 25 residents.

³ U.S. EPA commented that the Non-community primacy program was not discussed in the previous report. This footnote indicates the contrary.

⁴ CWS serve 15 or more year-round service connections or 25 or more year-round residents.

The Illinois EPA regulates 1,742 community water supplies (CWS). These water supplies utilize groundwater and surface water sources of potable water. At this time, 1,159 CWS use groundwater sources, 583 use surface water sources or groundwater sources under the direct influence of surface water (seven use both ground and surface water sources), and 697 supplies purchase water from other CWS. A total of 12,001,850 persons are served by those systems; 39 percent of that population is directly served from surface water systems. 34 percent of the population is served by purchased surface water, two percent by purchased ground water, and 25 percent by ground water systems. It is worth noting that although only 27 percent of the population is served by groundwater (including purchased ground water); groundwater dependent systems comprise almost 66 percent of the total number of community water systems.



The TNC PWS served a population of 334,917 in 2016, while NTNC PWS served a population of 149,902. A total of 444,478 persons are served by systems using ground water, while only 40,341 persons are served by surface water. These numbers reflect the areas where NCPWS are located predominantly in rural or non-incorporated areas where ground water is generally available as a source of potable water.

STATUTORY BACKGROUND

The program to protect PWS in Illinois began in 1915 and has undergone considerable legal and regulatory restructuring over the years. In 1970, the General Assembly formulated the Illinois Environmental Protection Act (Act), 415 ILCS 5/1 *et seq.* They found that “state supervision of public water supplies is necessary in order to protect the public from disease and to assure an adequate source of pure water for all beneficial uses.”

The “core mission” of the DPWS is to ***assure that all persons served by community public water supplies receive water which is safe in quality, clean, adequate in quantity and of satisfactory mineral character for ordinary domestic consumption.*** To accomplish this goal, the DPWS oversees the design, construction and operation of CWS in Illinois. More specifically, the Illinois EPA must review the safety and protection of drinking water source water, implement a permitting program for the design, construction and operation of PWS treatment facilities, and maintain a surveillance program of water systems’ untreated and treated waters.

To support these activities, the DPWS has been staffed by a diverse contingent of engineers, geologist and scientist that comprise the Compliance Assurance (CAS), Field Operations (FOS), Groundwater (GWS), and Permit (PS) Sections. The DPWS is further supported by the Infrastructure and Financial Assistance Section (IFAS) of the BOW, the Division of Information Services, the Division of Legal Counsel, the Division of Laboratories, and the State of Illinois' Central Management Services.

As mentioned previously, the Illinois DPH supports the Non-Community PWS program through a series of rules including, but not limited to: the Illinois Plumbing Code (77 Ill. Adm. Code 890); the Illinois Water Well Construction Code (415 ILCS 30); the Surface Source Water Treatment Code (77 Ill. Adm. Code 930) and the Drinking Water Systems Code (77 Ill. Adm. Code 900). The Illinois DPH's Division of Environmental Health works to reduce the incidence of disease and injury related to environmental factors that fall within five major areas of responsibility: rulemaking; plan reviews and construction permits; inspections; vocational and facility licensing; and engineering and toxicological reports.

To support these areas of responsibility within the Non-Community PWS, Illinois DPH has field staff located in the Department's six Regional Offices (RO) and leverages the resources of Local Health Departments (LHD). Compliance assurance and engineering services are generally conducted by staff located in the Central Office in Springfield. Consistent with the requirements of the Safe Drinking Water Act (SDWA) program activities include: sanitary surveys, water analysis and reporting; plan review; technical assistance; and training and education.

Under the SDWA and subsequent amendments, the U.S. EPA sets national limits on contaminant levels in drinking water to ensure that the water is safe for human consumption. These limits are known as Maximum Contaminant Levels (MCL) and Maximum Residual Disinfectant Levels (MRDL). For some regulations, treatment techniques are established in lieu of an MCL to control unacceptable levels of contaminants in water. The U.S. EPA also requires PWS to notify their consumers when they have violated these regulations. The consumer notifications must provide an understandable explanation of the nature of the violation, its potential adverse health effects, steps that the PWS is undertaking to correct the violation and the possibility of using alternative water supplies during the violation.

Through the ongoing review of Illinois EPA's programs, the U.S. EPA has granted the Illinois EPA primary enforcement authority to determine the frequency that CWS monitor and report on the contaminants present in their water. (Generally, the larger the population served by a water system, the larger the number of samples collected and the more frequent the monitoring and reporting (M&R) requirements.) Additionally, the U.S. EPA supports the development of new MCLs by requiring CWS to monitor and report on currently unregulated contaminants. As data are acquired for these contaminants, scientific analyses are conducted to determine the need for development of new MCLs.

In 1998, the Illinois EPA began making CWS revolving loans through a partnership with the U.S. EPA and the Federal Government. Since this time, the Illinois EPA has made more than \$1.3 billion in revolving loans to water systems. This money has gone to resolving MCL issues and improving the state's aging infrastructure.

REPORTING REQUIREMENTS

Each quarter, the Illinois EPA submits data to the Federal Safe Drinking Water Information System (SDWIS), an automated database maintained by the U.S. EPA. The data submitted by Illinois include, but are not limited to the following:

- PWS inventory information;
- incidences of violations of MCLs, MRDLs, monitoring, and Treatment Technique violations;
- information on enforcement activity related to these violations; and
- source water protection information.

The Illinois EPA publishes a report on its web site which contains information on permits issued during the previous year. The report includes CWS construction and operating permit process including milestones that measure program efficacy.

The Interagency Coordinating Committee on Groundwater reports biennially to the Governor and the General Assembly on groundwater quality, quantity, and the State's enforcement efforts.

OVERVIEW OF THE PWS PROGRAMS IN ILLINOIS

Community Public Water Supply Surveillance Program

To sustain compliance with regulatory requirements and ensure the safety of Illinois CWS consumers, the Illinois EPA is committed to completing engineering evaluations (sanitary surveys) as frequently as possible. Through the DPWS' institutional knowledge, the more frequent the contact between the Illinois EPA and CWS, the higher the percentage of compliant water systems.

The focus of the Illinois EPA's inspections of CWS continues to be an evaluation of the general operation and maintenance practices at the respective systems. Inspectors evaluate state regulations under 35 Ill. Adm. Code and various ancillary programs that affect the CWS, such as the regulations under the *Public Health Security & Bioterrorism Preparedness & Response Act of 2002*. Fundamental aspects of these inspections also revolve around the provision of technical assistance. The DPWS conducts surveillance and inspections at CWS from six regional offices located in Rockford, Elgin, Champaign, Springfield, Collinsville and Marion.

With assistance of national stakeholder groups, the U.S. EPA has established that over the next two-year reporting cycle, state primary enforcement programs should complete sanitary surveys at a minimum of 79.5 percent of the CWS in their state on a 3-year frequency. For this reporting period, the Illinois EPA has conducted sanitary surveys at approximately 91.3 percent (1,590 of 1,742) of the CWS under its regulatory authority.

Field Operations Section	
Springfield Central Office	Champaign Regional Office
<i>David McMillan, Division Manager</i>	Vacant, Manager
Rick Cobb, Deputy Division Manager	Matt Talbert
Vacant, Manager	Vacant (Env. Protection Engineer)
Rockford Regional Office	Springfield Regional Office
Vacant, Manager	David Cook, Manager
Joy Bliton	John Bartolomucci
Gene Forster	Steve Vance
	Michael Dragovich
Elgin Regional Office	Collinsville Regional Office
Segundo Nallatan, Manager	Gayle Battas, Manager
Dwayne Booker	James Blessman
Grover Hopkins	Regan Taylor
Dharmishtha Patel	
Jeff Peca	Marion Regional Office
Shibu Vazha	Jon Lam, Manager
Marlene Diamond (Admin. Support)	John Kinder
	Chris Johnston

Non-Community Public Water Supply Surveillance Program

The NCPWS surveillance Program shares many commonalities with the CWS surveillance activities. Sanitary surveys are intended to review the adequacy of the water system’s source of water, facilities, equipment, operation and maintenance to ensure the production and distribution of safe drinking water. Sanitary surveys for NCPWS are conducted once every two years by the Illinois DPH or LHD field staff. Illinois DPH Field Offices are located in Rockford, Peoria, Champaign, Marion, Edwardsville and West Chicago. There are 93 LHDs throughout the State that help conduct NCPWS surveillance and perform sanitary surveys. Illinois DPH RO staff and LHD staff that perform sanitary surveys generally work in several Public Health Surveillance Programs and many times conduct multiple program inspections while visiting a NCPWS. The NCPWS surveillance Program shares many commonalities with the CWS surveillance activities. Sanitary surveys are intended to review the adequacy of the water system’s source of water, facilities, equipment, operation and maintenance to ensure the production and distribution of safe drinking water. Sanitary surveys for NCPWS are conducted once every two years by the Illinois DPH or LHD field staff. Additionally, licensed facilities are normally inspected annually. Illinois DPH Field Offices are located in Rockford, Peoria, Champaign, Marion, Edwardsville and West Chicago. There are 93 LHDs throughout the State that help conduct NCPWS surveillance and perform sanitary surveys. Illinois DPH RO staff and LHD staff that perform sanitary surveys generally work in several Public Health Surveillance Programs and many times conduct multiple program inspections while visiting a NCPWS.

For the 2014-2016 calendar year time-frame, the Illinois DPH has conducted sanitary surveys at approximately 96.8 percent of the NCPWS under its regulatory authority.

Community Public Water Supply Compliance Assurance Program

To ensure Illinois CWS are in compliance with state and federal statutes and regulations, the Illinois Pollution Control Board (IPCB) adopts identical in substance regulatory provisions from

the U.S. EPA per, Section 5/7.2 of the Act. Ensuring that CWS are in compliance with these regulations, which include MCLs in drinking water, is substantially the core mission of the CAS. Additionally, CAS coordinates technical outreach to water systems to assure proactive compliance measures are taken ahead of formal enforcement. The DPWS conducts compliance efforts for CWS from the Central Office in Springfield.

Compliance Assurance Section
Vacant, Manager
Mark Britton
Shirley Leonard (Office Coordinator)
Chemical Monitoring Unit
Jeri Long, Manager
Mary Reed
Paul Connelly
Andrea Rhodes
Vacant (Environmental Protection Specialist)
Vacant (Environmental Protection Specialist)

Non-Community Public Water Supply Compliance Assurance Program

Similar to the CWS compliance program, the Illinois DPH tracks water system compliance with state and federal statutes and regulations. All NCPWS are tested at least annually for total coliform bacteria and nitrate. NTNC PWS are also tested for contaminants, such as pesticides, solvents, lead and copper, arsenic, metals and disinfection byproducts. Responsibility for tracking water system compliance is shared by Regional and Central Office staff. Data tracking activities are conducted by Central Office Staff.

Personnel
Eric Portz, Safe Drinking Water Program Manager
Jamie Tosetti, Environmental Health Specialist

Community Public Water Supply Operator Certification Program

In 2014, the Illinois EPA and PWS Advisory Board sponsored legislative changes to the Illinois Public Water Supply Operations Act (415 ILCS 45/). The primary purpose of this legislation was to facilitate compliance with the existing requirements of the Public Water Supply Operations Act by establishing a reliable mechanism for Illinois EPA communications with CWS, ensuring that Responsible Operators in Charge supervise the portions of the CWS for which they are accountable, and requiring the timely submittal of information that the Illinois EPA relies upon to protect drinking water quality. The focus of this initiative included making statutory and regulatory definitions consistent, clarifying statutory requirements and implementing administrative citation authority for reporting violations of Illinois regulation (e.g., consumer confidence reports, monthly operating reports, and drinking water compliance monitoring results).

Additionally, these regulatory changes clarified the Drinking Water Operator Certification Program regulations. The regulations include procedures for approval of contractual operations agreements between properly credentialed operators and CWS; detail an “Operator in Training” certificate status; and finally, establish maximum limits on certain types of training for certificate renewal credit which will become effective on July 1, 2017. At the time of this report, an additional regulatory proposal is being reviewed by Senior Managers at Illinois EPA. The primary emphasis of this proposal centers on further defining the experience requirement to become a licensed water supply operator in Illinois.

The Illinois EPA would also like to make note of our training partners. The operator training opportunities provided by the Environmental Resources Training Center at Southern Illinois University-Edwardsville, the Illinois Potable Water Supply Operators Association, Illinois Rural Water Association, Illinois Section of the American Water Works Association and two-year colleges are a huge factor in the successful treatment of potable water in Illinois. Whether large conferences, webinars, semester long classes, regional forums or water system specific curricula these educators, associations and individuals have afforded opportunities to water professionals in Illinois that is unparalleled across the country.

In past reviews of Illinois’ program, the U.S. EPA strongly encouraged the Illinois EPA to fill the position that oversees the implementation of the Operator Certification Program to ensure critical oversight of the program. The Illinois EPA’s CWS Operator Certification Program is administered by the CAS of the DPWS. The Illinois EPA estimates that this program requires approximately two full time staff. While these positions are vacant at this time, they are being covered by the staff described above in the CAS.

Non-Community Public Water Supply Operator Certification Program

The Illinois DPH NCPWS program administers a program to properly credential NTNC PWS from the Central Office in Springfield. The Illinois DPH uses the services of the Water Quality Association to conduct initial Operator Certification Training and administer certification examinations. The following Illinois DPH Environmental Health Services staff is actively involved in the administration of the program:

Personnel
Eric Portz, Safe Drinking Water Program Manager
Elaine Beard, Administrative Assistant

Capacity Development Program

The Illinois EPA and DPH continue to support the Capacity Development Program and are convinced that maintaining PWS capacity is essential in operating a safe drinking water system. The original premises presented in the Illinois Capacity Development Strategy have proven accurate. Technical assistance remains the cornerstone in developing capacity in PWS that are in distress. Although the resource demands of capacity assistance are significant, Illinois continues to believe that capacity development is an integral element of the working relationship between regulatory staff and PWS officials. As such, capacity demonstration elements will continue to be integrated into the routine activities of both Agencies in order to ensure continued progress.

It is difficult to estimate the full-time equivalents devoted to this program as it is integrated into all aspects of the drinking water program. In several recent U.S. EPA evaluations of the Illinois Capacity Development Program, U.S. EPA has expressed concerns that this program is understaffed. The Capacity Development is now coordinated by a staff member from the Permit Section of the DPWS:

Personnel
Kent Cook, Capacity Development Coordinator

Cross-Connection Control Program

The Cross-Connection Control Program in Illinois is one of several tools intended to protect water consumers in the state. Statutes in Illinois establish that no person can threaten a water supply and water supply officials are responsible for protecting their water mains from connections that have the potential to allow the backflow of contaminants into their respective distribution systems (a cross-connection). Regulations have been developed and modified to outline what comprises a viable Cross-Connection Control Program.

Water supplies in Illinois have significant partners in the implementation of their Cross-Connection Control Program. While it is up to the Illinois EPA to ensure that CWS have viable programs through physical inspection of water treatment facilities and documentation reviews, the Illinois DPH deals with the plumbing aspects of the program.

The Environmental Resources Training Center located at Southern Illinois University-Edwardsville provides for the training of licensed plumbers who wish to become certified Cross-Connection Control Device Inspectors (CCCDI). While any Illinois licensed plumber can inspect plumbing or install a backflow device or assembly, only an Illinois CCCDI can test that device or assembly. Additionally, the Illinois EPA relies upon the Environmental Resources Training Center to track and properly credential CCCDIs.

It is difficult to estimate the full-time equivalents devoted to this program as it is integrated into all aspects of the DPWS's programs. However, the Cross-Connection Control Program Coordinator Position remains vacant at this time.

Source Water Protection Program

The Source Water Protection Program in Illinois is framed by Public Acts 83-1268 and 85-063, and the SDWA Section 1453. These laws amended the Act, created the Illinois Groundwater Protection Act (IGPA), and led to the development of IPCB regulations for groundwater quality standards and protection requirements. Further, the IGPA requires stakeholder input from the Interagency Coordinating Committee on Groundwater (ICCG) and Groundwater Advisory Committee (GAC) on the development of groundwater protection programs, laws and policies. The Act was amended to require the development and implementation of a "priority" Regional Groundwater Protection Planning Program comprised of local stakeholders. In addition, the IGPA requires the ICCG to undertake a comprehensive evaluation of progress being made under these laws with biennial reporting to the Governor and General Assembly. The DPWS source water protection initiatives are generally managed from the Central Office in Springfield and the Rockford Office by the GWS of the DPWS.

Further, the IGPA responds to groundwater management by emphasizing a prevention-oriented process that relies upon state and local partnerships. The IGPA establishes a unified groundwater protection policy by: establishing groundwater quality standards; requiring technology control regulations; establishing a groundwater education program; establishing water well protection zones; providing for surveys, mapping, and assessments; monitoring ambient groundwater quality; establishing a regional groundwater protection-planning program; and establishing authority for recharge area protection.

Every two years, ambient groundwater monitoring is reported as part of the Integrated Water Quality Report submitted to U.S. EPA under Section 305(b) of the Clean Water Act. The 2016 Report was just prepared for submission to U.S. EPA and is available at: <http://www.epa.illinois.gov/Assets/iepa/water-quality/watershed-management/tmdls/2016/303-d-list/iwq-report-ground-water.pdf>

Personnel	
Groundwater Section	Source Water Protection Unit
Rick Cobb Manager	Anthony Dulka, Manager
Vacant, Office Associate	Joe Konczyk (Springfield Office)
	Laurie Moyer (Rockford Office)
	Greg White (Rockford Office)
Geographical Analysis Unit	Hydrogeology and Compliance Unit
Vacant, Manager	Bill Buscher, Manager
Ryan Bennett	Lynn Dunaway, Lead Geologist
Alan Fuhrman	Amy Zimmer
Ed Wagner	Vacant, Environmental Protection Geologist

Permitting Program

Correct construction and operation of a PWS is essential for providing a safe and adequate supply of drinking water. The DPWS conducts all permitting function for CWS from the Central Office in Springfield.

Personnel	
Permit Section	
David Cook, Acting Manager	Chris Kohrman
Rob Watson, Lead Engineer	Gerard Zimmer
Vacant, Environmental Protection Engineer	Carolyn Ealey, Office Associate
Mike Hayes	Charita Banks, Office Associate

Public Water Supply Revolving Loan Program

The PWS revolving loan program is administered by the BOW-IFAS. IFAS also administers the Water Pollution Control revolving loan program. IFAS manages all aspects of the funding process with input from the DPWS. Detailed program information is available on the Illinois EPA web site at <http://www.epa.illinois.gov/topics/grants-loans/water-financial-assistance/state-revolving-fund/index>.

Generally, the first step toward the Illinois EPA working with an applicant to fund a project is the submittal of a planning report, called a “Project Plan” in Illinois’ Administrative Loan Rules. An applicant must also complete a Project Planning Submittal Checklist which identifies the location of other necessary information for application processing. Once a scope of work is identified in a “Project Plan,” IFAS staff will distribute the planning report to the PS and FOS for review and approval. The CAS is also consulted to ensure funding is provided to address the loan applicant’s most pressing needs. Once comments from each of these Sections are received, IFAS sends a review letter requesting any additional information that is needed or answers to any questions the Illinois EPA may have. IFAS then produces a Project Summary document and the loan applicant will be required to either hold a public hearing (if the potential for environmental issues exists or if financial impacts to the loan applicant’s residents are significant), or simply place an ad in the local newspaper announcing the proposed project and request for funding. The public hearing, or placement of an ad in the local newspaper, is followed by a 10-day public comment period allowing for the submission of written comments concerning the proposed project. Once the public comment period is over and IFAS receives proof of the public notification in the newspaper and any responses to any public comments, the Illinois EPA will issue Planning Approval. Planning Approval is good for five years. Therefore, once a scope of work has been identified and approved, the loan applicant can pursue funding for any portion(s) of that scope within the following five years.

The Illinois EPA’s revolving loan funding process is unlike that of a bank in the respect that the Illinois EPA does not offer the funding agreement until after the recipient has demonstrated a definitive need for the project, obtained Illinois EPA Planning Approval, obtained all necessary permits, demonstrated the means and ability to repay the funding, adopted all necessary ordinances to do so and then gone out to bid on the project. Once a “winning/low” bidder is identified, the Illinois EPA can issue the Loan Agreement followed by the loan applicant entering into the contract for construction of the project. Currently, the Illinois EPA can fund the construction costs as well as design engineering and construction engineering/oversight. At the present time, loan applicants are anticipating funding being provided as a 20-year loan at an interest rate of approximately 1.77 percent for State Fiscal Year 2018. Interest rates are established each July 1 for the wastewater loan program, and October 1 for the drinking water loan program, for the following 12-month period based upon one-half of the previous 12-month mean interest rate of the 20 General Obligation Bond Buyer Index.

The U.S. EPA has determined that lead service line replacement is an eligible loan expense. Following a legislative amendment, the Illinois EPA is processing its first lead service line replacement project in 2017.

The IFAS conducts all revolving loan functions for CWS from the Central Office in Springfield. The BOW estimates that this program currently utilizes 15 full-time staff.

MEASURING RESULTS

Numerous tools are used to measure program effectiveness. The SDWIS is a key component in the tracking of overall program effectiveness. Quarterly uploads of data by the DPWS CAS and the Illinois EPA Division of Information Service to U.S. EPA is the foundation by which the Illinois EPA and CWS are evaluated with regard to primacy requirements and program

measures. Beyond these federal requirements, SDWIS is used by the DPWS to ensure that routine inspections of CWS are occurring, proper permits are obtained and safe water is being supplied to Illinois' water consumers. Additionally, the PS utilizes a permit tracking data system to ensure that construction and operating permits are issued in a timely fashion (currently, well under the 90 day statutory requirements). This tracking system is reliant upon the SDWIS as a framework as is the Groundwater Section's PROTEUS system. PROTEUS is a database designed using web-based development tools. Groundwater, source water, and PWS engineering evaluation data and SDWIS continue to be integrated into the PROTEUS database.

Community Water Supply Compliance Assurance Program

For calendar year 2016, 98.7 percent (11,848,624 of 12,001,850) of the population served by CWS in Illinois receive drinking water that meets all applicable health-based drinking water standards. Also, for calendar year 2016, 97.2 percent (1,693 of 1,742) of CWS in Illinois meet all applicable health-based drinking water standards.

Each quarter, the Illinois EPA submits data to the SDWIS/Federal. The data submitted include, but are not limited to: PWS inventory information; the incidences of violations of Maximum Contaminant Levels; Maximum Residual Disinfectant Levels; monitoring, and treatment technique violations; and information on enforcement activity related to these violations. This report provides the numbers of violations in each of six categories:

- 1) Maximum Contaminant Level violations,
- 2) Maximum Residual Disinfectant Level violations,
- 3) Treatment Technique requirement violations,
- 4) Significant violations of Monitoring and Reporting requirement violations,
- 5) Significant violations of the Consumer Notification requirements,
- 6) and Violations of Variances and Exemptions.

Attached to this report as Appendix A is a listing for each contaminant regulated by the SDWA, which includes the numbers of MCL, MRDL, Treatment Technique and M&R requirement violations for each compliance period during calendar year 2016, the number of violations that were returned to compliance (RTC), and the number of systems incurring violations. Appendix B and Appendix C contain a detailed listing of PWS with MCL, MRDL, or Treatment Technique violations.

Acute vs. Chronic Indicators - It is important that safe drinking water be free of contamination which has the potential to cause either short-term or long-term health effects. Contaminants fall into two groups according to the health effects that they cause:

ACUTE

Acute effects occur within hours or days of the time that a person consumes a contaminant. People can suffer acute health effects from almost any contaminant if they are exposed to extraordinarily high levels (as in the case of a spill). In drinking water, microbes, such as bacteria and viruses, are the contaminants with the greatest chance of reaching levels high enough to cause acute health effects. Most people's bodies can fight off these microbial contaminants the way they fight off germs; and these acute contaminants typically do not have permanent effects. Nonetheless, when high enough levels occur, they can make people ill, and can be dangerous or deadly for infants, the elderly and persons whose immune systems are already weak due to HIV/AIDS, chemotherapy, steroid use, or another reason.

CHRONIC

Chronic effects occur after people consume a contaminant at levels over EPA's safety standards for many years. U.S. EPA develops the standards for chronic MCLs on the basis that a person may have an adverse health effect after consuming two liters of water daily over a 70-year lifetime. The drinking water contaminants that can have chronic effects are chemicals (such as disinfection by-products, solvents, and pesticides), radionuclides (such as radium), and minerals (such as arsenic). Examples of the chronic effects of drinking water contaminants are cancer, liver or kidney problems, or reproductive difficulties.

As described previously, over 98 percent of the population served by Illinois CWS received drinking water in compliance with acute (short-term) health requirements, and 98 percent were in compliance with chronic (long-term) health requirements. It is important to note that most non-compliance was short in duration, and the potential for health risk was minimized through prompt corrective action by the water supplies. Supplies with microbial problems (bacterial or turbidity non-compliance) are required to issue boil orders when the violation occurs. Community water systems with acute MCLs were limited to 12 (nitrate, nitrite and e coli MCL and SWTR TT) water systems.

Lead and Copper Compliance -

Lead and copper are regulated by a Treatment Technique that requires systems to control the corrosiveness of their water. The lead action level (15 parts per billion), when exceeded in more than ten percent of the water samples collected in consumers' homes, requires the water supply to implement optimal corrosion control treatment plans or

procedures which would prevent anticipated adverse health effects and ensure that lead or copper is controlled in the drinking water.

Beyond the regulatory requirements of the Lead and Copper Rule, the Illinois EPA:

- Made revisions to sampling instructions and education materials to CWSs based upon information supplied by U.S. EPA, including deletion of any mention of "pre-flushing" lead service lines the night before sample collection and removing faucet aerators; and
- Expedited the path from lab analysis of samples to consumers, in that CWSs now notify consumer/volunteer sample collectors of results greater than 15 ppb within 10 days of becoming aware of lab results.

In 2016, 671 of 1,742 CWS sampled for lead and copper. Only 12 of these systems were over lead action level.

Consumer Awareness for CWS - Every CWS must provide an annual report (sometimes called a Consumer Confidence Report or CCR) to its customers. The report provides information on local drinking water quality, including the water's source, the contaminants found in the water, and how consumers can get involved in protecting drinking water. If the consumers have been looking for specific information about their drinking water, this annual report will provide them with the information they need. In 2016, 94 percent of the CWS issued a satisfactory Consumer Confidence Report by the annual July 1 deadline.

Public Notification for CWS - In conjunction with each violation described in the previous sections, public notification is required to be issued. Public notification provides a means to protect public health, build trust with consumers through open and honest sharing of information, and establishes an ongoing, positive relationship with the community. Public notice can also be used to help consumers understand rate increases and support increased funding for drinking water treatment and protection. Properly done, the notices can work for the benefit of the water supplier as well as the public. In the event that a problem occurs, educated consumers are more likely to understand the problem and support the actions a water utility must take. Many deadlines for public notice issuance depend upon prompt contact and discussion between the water system and Illinois EPA. Efficient communication with prompt reporting is the cornerstone for compliance. In 2016, less than two percent of the community water systems failed to meet all public notice requirements.

Public Education for Lead for CWS – Public education materials for lead must be provided to customers if a CWS exceeds the lead action level in their most current round of monitoring. As mentioned previously, approximately 99.5 percent of CWS were below the lead action level in their most recent round of sampling and therefore public education was not required. During 2016, only one public education violation was issued.

Monitoring and Reporting Compliance for CWS - The U.S. EPA has established contaminant-specific minimum testing schedules for public water systems. Water systems typically monitor for bacteria, protozoa and viruses, nitrate and nitrite, volatile organic compounds (e.g., benzene), synthetic organic compounds (e.g., pesticides), inorganics (e.g., arsenic), lead and copper, and radionuclides. Although failure to monitor does not necessarily suggest safety problems, conducting the required M&R is critical to ensure that problems will be detected. In 2016, 87 percent of community supplies were compliant with M&R requirements.

Illinois EPA Enforcement Strategy - The Illinois EPA has enforcement authority over CWS in Illinois. Illinois EPA has a standardized protocol for all enforcement matters to ensure unilateral, consistent treatment of enforcement cases. For any violation outlined in the previous pages, a failure to take corrective action could result in the water system being considered for enforcement under Section 31 of the Act. Enforcement normally begins with the identification of a significant unresolved violation by technical staff. Information about the violator/violations is forwarded to the Compliance Group (composed of Section Managers). If the Compliance Group determines a Violation Notice (VN) is warranted, the VN recommendation is sent to the Agency's Compliance Management Panel for review. After review by the Panel, the CAS prepares and issues the VN. After the VN is sent, the violator will have a set time period (45 days or 60 days depending on whether a meeting is requested) to respond in writing with a

Proposed Compliance Commitment Agreement (CCA). Enforcement activities are suspended if the proposed CCA is accepted by the Agency. If at a later point in time, the violator does not follow the CCA agreement, enforcement may resume.

If the proposed CCA is not accepted or the violator fails to respond to the VN, the case is brought before the Enforcement Decision Group (EDG), composed of senior BOW and Division of Legal Counsel management. The EDG determines the next course of action such as recommending a case for formal enforcement. Formal enforcement normally consists of referring the water system to the Illinois Attorney General or the U.S. EPA for filing with a court to direct corrective actions, which may include imposition of penalties.

Violation Summary - Current and historical violation data⁵ and follow-up enforcement actions can be found at the following web site: <http://www.epa.illinois.gov/topics/drinking-water/index>

The following tables summarize the number of CWS in violation with aspects of the drinking water compliance program during 2016.

⁵ The data for this reporting originates and is maintained in the Illinois Safe Drinking Water Act Information System.

Violations during Calendar Year 2016 COMMUNITY Water Systems						
Total Number of Regulated Systems					1742	
Total Number of Systems in Violation					286	
Total Number of Violations					491	
Rule Subtotal by Violation Type						
Rule Category	MCLs		Treatment Techniques		Significant Monitoring Reporting	
	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*
Radiological	31	10	NA	NA	15	9
Nitrates	8	5	NA	NA	7	7
IOCs	17	7	NA	NA	1	1
SOCs	0	0	NA	NA	100	9
VOCs	0	0	NA	NA	0	0
Coliform	9	6	NA	NA	29	18
Ground Water Rule	NA	NA	0	0	1	1
All SWTR	NA	NA	2	1	6	3
DBPR (Stage 1) (chlorine_chloramines)	NA	NA	NA	NA	44	41
DBPR (Stage 2)	27	12	0	0	25	14
Lead & Copper	NA	NA	9	8	32	30
Consumer Awareness	NA	NA	NA	NA	123	100
TOTALS	92	40	11	9	388	237
	Percentage of Systems In Compliance = 97%		Percentage of Systems In Compliance = 99%		Percentage of Systems In Compliance = 86%	

Although a CWS may be out of compliance with more than one contaminant or violation type, when calculating totals, it is counted no more than once within the population being totaled. So, the sum of NUMBER OF CWS IN VIOLATION, over the various violation types or contaminants, may not add up to the total.

Non-Community Water Supply Compliance Assurance Program

Both NTNC and TNC are required to monitor for contaminants like CWS and issue public notification if in violation. However, TNC only monitor for nitrates, coliform bacteria, and are subject to some requirements of the surface water treatment rule (if they use surface water). NTNC monitors the same contaminants as CWS, but are not required to monitor radionuclides or issue/publish a consumer confidence report.

The Illinois DPH has enforcement authority over NCPWS in Illinois. Illinois DPH has a standard protocol for enforcement matters to ensure consistent treatment of enforcement cases. For any violation outlined in the previous pages, a failure to take corrective action could result in the water system being considered for enforcement under Section 9 of the Illinois Groundwater Protection Act. Enforcement normally begins with identification of a significant unresolved violation by technical staff. The Illinois DPH RO or LHD determines an appropriate amount of time to perform corrective action and send a VN to the water supply requesting corrective action within the time frame allowed. If corrective action is not performed within this time frame,

information is forwarded to the Illinois DPH Central Office to initiate formal enforcement action. A letter is then sent to the State's Attorney, the Attorney General or U.S. EPA requesting enforcement action which may include imposition of penalties.

During calendar year 2016, the percentage of persons served by Illinois NCPWS that were compliant with all health requirements, treatment techniques, or health advisories was 99.6 percent.* The following tables summarize the number of NCPWS in violation with aspects of the drinking water compliance program.⁶

⁶ These figures have not been verified with local health department (LHD) staff, which has direct oversight for these water systems.

Violations during Calendar Year 2016 NON-COMMUNITY Water Systems						
Total Number of Regulated Systems					3,755	
Total Number of Systems in Violation					234**	
Total Number of Violations					3,100**	
Rule Subtotal by Violation Type						
Rule Category	MCLs		Treatment Techniques		Significant Monitoring Reporting	
	Number of Violations	Number of Systems	Number of Violations	Number of Systems	Number of Violations	Number of Systems
Radiological	NA	NA	NA	NA	NA	NA
IOCs	8*	4	NA	NA	343*	152*
SOCs	0	0	NA	NA	1,290	40
VOCs	1	1	NA	NA	1,323	38
Coliform	10*	10*	NA	NA	56*	49*
Ground Water Rule	NA	NA	0	0	2*	1*
SWTRs	NA	NA	0	0	0	0
DBPR (Stage 1)	0	0	0	0	26	13
Lead & Copper	NA	NA	0	0	41	39
Consumer Awareness	NA	NA	NA	NA	0	0***
TOTALS	19*	15*	0	0	3,081**	219**
	Percentage of Systems In Compliance = 96.9%*		Percentage of Systems In Compliance = 100%		Percentage of Systems In Compliance = 96.4%**	

Although a NCPWS may be out of compliance with more than one contaminant or violation type, when calculating totals, it is counted no more than once within the population being totaled. So, the sum of NUMBER OF NCPWS IN VIOLATION, over the various violation types or contaminants, may not add up to the total.

These figures have not been verified with local health department staff which has direct oversight for these water systems.

** This data is incomplete at this time.

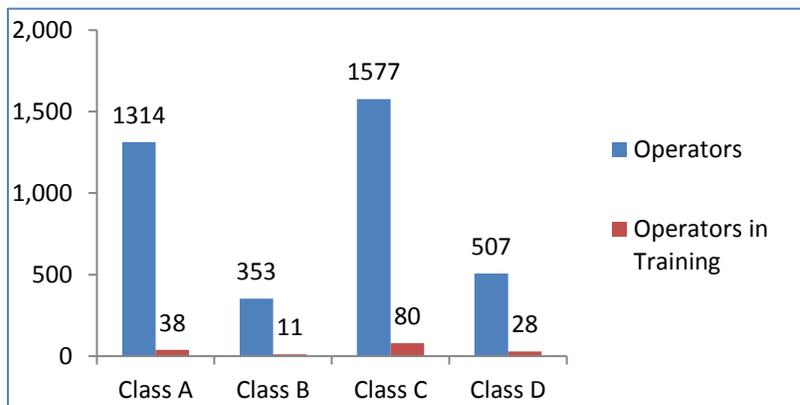
*** DPH does not include public notice for monitoring violations in the compliance rate.

Community Water Supply Operator Certification Program

The Illinois EPA administers the Drinking Water Operator Certification program through 35 Illinois Administrative Code 681 implemented and authorized by Section 10 of the Public Water Supply Operations Act (415 ILCS 45/).

In 2016 there were 1,742 Community Water Supplies (CWS) facilities in Illinois. These facilities are divided into four classifications based on the complexity of treatment. Class D facilities are generally CWS with limited pumpage, storage and distribution systems. Class C facilities are generally CWS whose treatment facilities are limited to chemical addition. Class B facilities are CWS whose treatment facilities generally include filtration, aeration, or ion exchange. Finally, Class A CWS are water treatment facilities that generally employ surface water treatment techniques, including coagulation, lime softening, sedimentation, or advanced filtration. In 2016, there were 440 Class D, 729 Class C, 413 Class B, and 160 Class A CWS.

In 2016, in Illinois, there were 3,751 fully certified operators broken down as follows: 1,314 A operators, 353 B operators, 1,577 C operators and 507 D operators. Each CWS in Illinois is required to employ a Responsible Operator in Charge (ROINC) to directly supervise the water system. The ROINC is required to hold a valid certificate at a level equal to or greater than the classification of the CWS. To become a certified drinking water operator in Illinois, a person must take and pass an exam. The exams are comprised of questions to establish that person has the necessary knowledge to perform the job. Once a person passes an exam they achieve the title of Operator in Training (OIT). The certificate for an OIT is valid for a period of six years. An OIT is not fully certified and therefore is not able to act as a ROINC for any water system. In order to obtain full certification, an OIT is required to submit an application showing that the education (a high school diploma or GED), and experience requirements have been met for the level of certification requested. The minimum experience requirements defined in the regulation must be met before full certification will be granted.

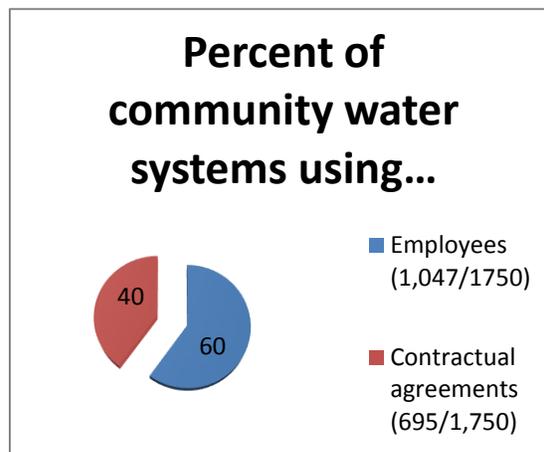


A portion of the experience requirements may be met with advanced education or training pertinent to the field. A person may hold a valid certification and be an OIT at a higher certification level at the same time. During 2016 there were a total of 157 OITs broken down as follows: 38 A OITs, 11 B OITs, 80 C OITs and 28 D OITs.

Early in the Operator Certification program, Grandfathering of operators was permitted. Upon successful completion of a program, a certificate was awarded at the same level as the water system for which the person was responsible. The certifications were site specific and non-transferable. The grandfathered operator was then required to obtain renewal training hours in order to maintain their certification. At one time Illinois had 139 operators with grandfathered

certifications. In 2016, only 28 of the certifications were still valid. Illinois no longer issues grandfathered certifications for CWS.

Procedurally, non-compliant CWS are immediately advised, via a Non-Compliance Advisory (NCA), of the serious nature of not having a properly certified responsible operator and options for achieving compliance. (In the past, some of these concerns may not have entered the enforcement management and tracking system as quickly). These advisories are often issued because the Illinois EPA has not received documentation that delineates the properly credentialed individual(s) at the water system. In most cases, these NCAs can be viewed as a “paper work” violation with the water system returning to compliance almost immediately. However, when necessary, these advisories are followed by formal Violation Notices (VNs) consistent with Section 31 of the Act that in turn can be followed by a Notice of Intent to Pursue Legal Action. The culmination of this process is a referral to the Attorney General’s Office to ensure compliance and to seek a monetary penalty. The Illinois EPA generally feels this process has been effective as documented by the high compliance values described subsequently.



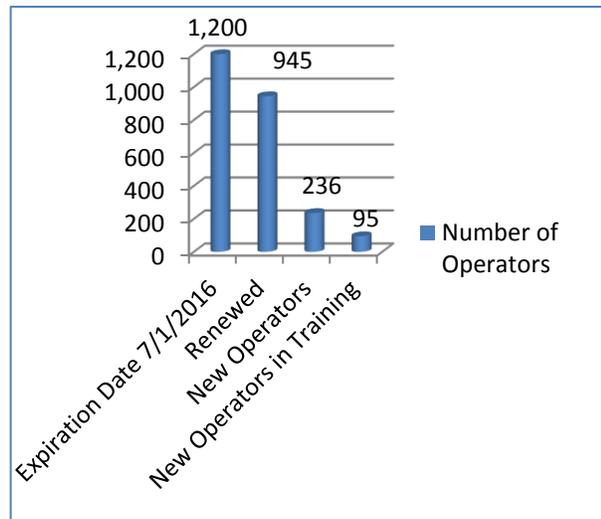
During this reporting period, the Illinois EPA sent 86 NCAs and 2 VNs to water systems to address their lack of properly credentialed operational staff⁷. The VNs were issued due to lack of a contractual agreement that met all of the required parameters. The Illinois EPA believes that this high compliance rate can be attributed to the implementation of weekly certification compliance tracking that identifies those facilities in need of a properly certified responsible operator.

In addition to the above enforcement actions, an operator commits a Class 4 felony if he or she knowingly makes a false, fictitious or fraudulent material statement, orally or in writing to the Illinois EPA. Through Operator Sanctions (681 subpart G) the Illinois EPA may revoke or suspend a certification. There were no suspensions or revocations in 2016. Gross misconduct or any act that may endanger health of the public may warrant criminal charges. Due to budgetary constraints, the Illinois EPA refers criminal cases to the Criminal Investigation Division of the U.S. EPA. No criminal cases were referred during 2016.

The Illinois EPA phased in the renewal training requirement with approximately one-third of the operators renewing their expiring certificates each year. All Illinois drinking water operators are required to have training as a prerequisite for their certificate renewals. Training courses are approved by the Illinois EPA to ensure that the subject matter is acceptable and applicable to the profession. Operators with a valid A or B Certification are required to obtain 30 renewal training

⁷ In the previous reporting cycle the U.S. EPA questioned whether the Illinois EPA could begin inputting a type 12 violation to track operator noncompliance concerns. Upon research, this code has very limited application and would not supply the intended information.

hours per each 3-year renewal period. Operators with a valid C or D Certification are required to obtain 15 renewal training hours per each 3-year renewal period. In March of the year that their certificate is set to expire, operators are sent a Renewal Application Form and Training Summary Report to advise them of their remaining hours required for certificate renewal. The Illinois EPA provides an *Approved Drinking Water Training Course Catalog* to operators upon request. In this reporting period, 945 operators have successfully completed the required training and have renewed their certificates, and 255 operators had certificates that expired. Of the total OITs



(157) listed previously, 95 earned their OIT status in 2016. Additionally, 236 operators were newly certified, comprised of: 34 Class A; 23 Class B, 117 Class C; and 62 Class D.

If an operator fails to renew their certification within the three-year period, their certification expires. That operator then has two years in which to provide documentation of successful completion of the required renewal training hours in order to restore their certification. However, the date of expiration of the restored certificate remains the same as it would have been had he or she renewed on time. If certification is not restored within a two-year period, the certification becomes invalid and to recertify the person must retest and submit an application as if they were seeking certification for the first time.

The Illinois EPA through statutory authorization administers a fee program to recover a portion of the cost of administering the Operator Certification Program. Certification fees are processed daily by the Compliance Assurance Section (CAS) and sent to the Illinois EPA’s Division of Fiscal Services. These fees are tracked on monthly reports of the fees collected for application, renewal, and reinstatement. The Illinois EPA continues to emphasize the importance of the Operator Certification Program and utilizes several funding mechanisms to overcome shortfalls in the existing fee structure. In past reviews of Illinois’ program, the U.S. EPA strongly encouraged the Illinois EPA to fill the position that oversees the implementation of the Operator Certification Program to ensure critical oversight of the program. The Illinois EPA’s CWS Operator Certification Program is administered by the CAS of the DPWS. The Illinois EPA estimates that this program requires approximately two full time staff. While these positions are vacant at this time, they are being covered by the staff in the CAS.

The Illinois EPA would also like to make note of our training partners. The operator training opportunities provided by the Environmental Resources Training Center at Southern Illinois University-Edwardsville, the Illinois Potable Water Supply Operators Association, Illinois Rural Water Association, Illinois Section of the American Water Works Association and two-year colleges are a huge factor in the successful treatment of potable water in Illinois. Whether at large conferences, webinars, semester long classes, regional forums or water system specific

curricula these educators, associations and individuals have afforded opportunities to water professionals in Illinois that is unparalleled across the country.

The success of the program also relies on both internal and external reviews of the CWS Operator Certification Program. Internal reviews are on-going. During 2016, the Illinois EPA proposed additional revisions and clarifications within the existing operator certification regulations. The Agency is hopeful that these revisions will be approved in 2017. In March 2013, the certification data system modifications were completed and released to the public. Drinking water operators can now use the data system (via web site) to review their certification and personal records and enter their own renewal training credit hours at <http://dataservices.epa.illinois.gov/operatorcertification/opcertwelcome.aspx> .

The Illinois EPA meets with the Public Water Supply Operator Certification Advisory Board at least two times per year. For meeting times, minutes and agendas see <http://www.epa.illinois.gov/topics/drinking-water/operator-certification/index>. During these meetings, the Advisory Board reviews renewal/examination statistics, reports from the Exam Committee, reciprocity data, application/applicant approval process for testing, and training criteria. At these meetings, the Illinois EPA is also provided direction for Operator Certification Program enhancements.

The Illinois EPA also meets at least annually with the Examination Committee. This Committee is supported by the Environmental Resources Training Center through contractual agreement with the Illinois EPA. In 2015, new examinations for Class A were released with a great deal of resources devoted to the question database. A new exam for Class B is ready and the Illinois EPA plans to release it early in 2017. It is important to note that the Environmental Resources Training Center is also the location of one of the state's leading water and waste water training facilities and has been integral in assisting the Illinois EPA in the development of the certified operator database, use of modernized testing software and development of technical assistance documents.

Non-Transient Non-Community Water Supply Operator Certification Program

All major program elements for the NTNC Water Operator Certification Program have been implemented. (As previously described NTNC are PWS serving at least 25 of the same non-residents for 6 months per year.) Currently there are 425 of these systems in Illinois. Over the reporting period, 399 (93.9 percent compliance) of these have properly certified responsible operators. For the 109 NTNC systems that have some type of chlorine disinfection installed, 107 or approximately (98 percent) have a certified operator.

Five hundred and thirty-five NTNC water supply operators are currently trained and certified in Illinois (491 are certified by the Illinois DPH and 44 are certified by the Illinois EPA). Initially, NTNC operators must pass a 12-hour course consisting of eight sections with an exam at the end of the course. Periodically, a review of the course's eight sections is done to evaluate the effectiveness of the training, ensure quality, and compliance with U.S. EPA's guidelines. The eight sections of the course include: 1) workplace safety; 2) source water characteristics; 3) equipment maintenance; 4) sampling requirements and procedures; 5) system disinfection; 6) emergency procedures; 7) administration for water supply operations; and 8) mathematics.

Currently, no fewer than two initial courses are held annually allowing systems to maintain operator compliance.

After the initial training, operators must meet training requirements for subsequent certificate renewals. Certification renewals began in the fall of 2005. Illinois DPH phased-in the renewal-training requirement as approximately one-third of the operators renew their expiring certificates each year. All NTNC operators must complete an approved renewal course as a prerequisite for their certificate renewals. Operators who renew are required to submit documentation to the Illinois DPH that they have taken the required training.

Renewal course guidelines were reviewed with several industry-wide water education organizations. After this review was complete, computer based training, meeting renewal-training requirements was chosen as the most effective option available. The Illinois DPH selected the Operator Basics 2005 Program developed by the Montana Water Center in cooperation with U.S. EPA as the renewal course.

In June of each year, operators are sent a letter advising them of their expiring certificates. This letter provides instructions on how to download and complete the course or how to order the CD version from the National Environmental Services Center. As of April 30, 2008, the availability to complete the Operator Basics 2005 Course online was discontinued by the Montana Water Center. The Illinois DPH acquired a supply of CDs from National Environmental Services Center and, in the letters mailed, informed operators a CD could be obtained directly from the Department. Feedback on the course remains positive.

In August of each year, all NTNC PWS are sent “Operator Summary” letters informing them of the operators registered with Illinois DPH. These letters notify each system of any operators with expiring certificates and the importance of having a properly certified responsible operator. In 2016, 58 new operators were certified and 95 current operators renewed their certifications.

Non-compliant, NTNC water supplies are immediately advised of the serious nature of not having a properly certified responsible operator and options for achieving compliance. Formal enforcement is evaluated for systems that are significantly non-complaint. Enforcement actions are conducted similar to water quality or monitoring violations. A VN is sent and formal enforcement follows if the water system does not take action. Some LHDs are issuing violations for operator compliance, but the Illinois DPH has not been inputting those in SDWIS in the last three years due to resource limitations. However, the percentage of supplies achieving compliance is currently 93.9 percent and supplies requiring enforcement action has decreased over time.

U.S. EPA has expressed concern regarding the status of NCPWS that chlorinate. Only two of these systems (two percent) are out of compliance with operator requirements. The Illinois DPH believes this relatively high compliance rate is due to increased efforts to make contact with these systems. The Illinois DPH Central Office Program staff are monitoring any schools that chlorinate and contacting these systems directly if operator non-compliance persists. Currently, only one school that chlorinates does not have a certified operator. Overall the compliance rate,

particularly for chlorinating water systems, is encouraging. The Illinois DPH will continue with the efforts that brought about this increase.

The Department continues to consult with the Water Quality Association regarding the content of the initial certification course. Illinois DPH is concerned that the Montana 2005 Basics Course is no longer available for download from the Montana web site. This course has been the Illinois DPH standby for operator recertification. This being the case, the Illinois DPH is getting help from technical providers for class room sessions. Rural Community Assistance Program (RCAP) provided two class room recertification courses as an option to the Montana Course in 2016. Illinois DPH will continue to seek help from RCAP and review other options for recertification opportunities.

The number of NTNC PWS on the U.S. EPA ERP non-compliance list is decreasing. This success is, in-part, attributable to the Operator Certification Program providing qualified operators for NCPWS. Further, the Illinois DPH has instructed ROs and LHDs to increase efforts to contact systems without a certified operator to increase compliance rates. Indications are that this strategy is having success. The final compliance rate for 2016 improved to 93.9 percent.

As mentioned above, the Illinois DPH sends an annual letter to each NTNC PWS with the certification status of all operators on file. The dates of new operator classes are also sent to all NTNC PWS prior to each class. In June of each year, a letter goes out to all certified operators that are due for re-certification by the end of the year. Each time these letters are sent out a list of systems in non-compliance is sent to the ROs and LHDs instructing them to contact these water systems. ROs and LHDs are also instructed to cite operator non-compliance as a significant deficiency in sanitary surveys.

The Illinois DPH continues to place emphasis on the eight TNC PWS that use surface water as their source. The Department will continue providing training to these facilities on a periodic (as needed) basis. Since these systems receive annual sanitary surveys by RO staff, technical assistance opportunities are conducted at least once per year.

The Illinois DPH will take the opportunity to solicit stakeholder involvement in the operator certification program during the development and implementation of the Revised Total Coliform Rule (RTCR). While stakeholder involvement has been limited thru 2016, the Department expects that in late 2017 this will increase if U.S. EPA approves the IDPH State Specific RTCR proposed rule and the formal rule-making process begins. To this point, the focus on the RTCR has been in the rulemaking process being covered primarily by Illinois DPH and LHD personnel.

Capacity Development Program

A review of SDWIS data indicates that 115 new CWS have been activated since October of 1999 with 73 of these systems activated subsequent to October 2003. As described in the *ILLINOIS ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT, September 30, 2005*, Illinois' program has been implemented in two parts:

- First, all new public water supplies that became active after October 1, 1999, were required to complete a capacity development demonstration. Illinois adopted regulations to implement this requirement. Failure to meet this deadline would have resulted in a loss

of up to 20 percent of the State Revolving Loan Fund monies allocated to Illinois each year.

- Second, Illinois was required to develop a Capacity Development Strategy by September 30, 2000. The purpose of this Strategy is to structure a work plan that Illinois will implement to ensure that existing public water supplies have the capacity to achieve compliance, and continue to operate in compliance with all existing and future drinking water program standards and requirements. Failure to meet this deadline would have resulted in a loss of up to 20 percent of the State Revolving Loan Fund monies allocated to Illinois each year. The Illinois Capacity Development Strategy was approved by U.S. EPA on September 27, 2000.

The first part of this strategy has proven effective. As documented in Appendix D, none of these new systems have had significant compliance issues even though most would be considered small systems. Arguably, the second portion of this strategy has not been quite as successful as described in the compliance figures in the Background portion of this document.

The Illinois DPH administers the NCPWS Capacity Development Program (see Appendix E, for a summary of new systems and compliance issues). This program is unique because these systems are not in the business of producing water for resale; therefore, the treatment and monitoring of the water system has not traditionally been a routine function of management. The water supply at these facilities is used for drinking, sanitation and, in some cases, manufacturing processes. Demonstrating capacity for these types of NCPWS is, for the most part, a small part of the overall management, budget and operating plan for a specific PWS. Illinois DPH uses existing field survey and visit opportunities to identify NCPWS which need or may benefit from capacity development assistance. However, Illinois DPH approaches the water supply compliance issues from a somewhat unique perspective of a side benefit activity rather than a primary activity, and must work within the framework of the entire operation to best assist the supply in developing capacity. Central office staff coordinates the dissemination of information and education of NCPWS personnel for all new or amended regulations and requirements. When capacity assistance is needed on-site, central office staff accompanies field staff or LHD staff to provide training or technical assistance.

The Illinois EPA and DPH would like to make special note of the leadership shown by Illinois associations, education institutions and operator groups in the development of Financial, Managerial and Technical Capacity. The Illinois EPA especially thanks the Illinois Rural Water Association for their partnership. The Illinois Rural Water Association routinely meets with the Illinois EPA to discuss emerging education needs in all three areas of capacity development. Additionally, the Illinois EPA is appreciative of the efforts of the Illinois Section of the American Water Works Association and the Illinois Potable Water Supply Operator's Association. All three Associations, as well as local operator groups, routinely invite Illinois EPA staff to speak at their conferences (four separate multi-day annual conferences between the three Statewide Associations). These collaborations are highly effective in educating water supply officials. Over the reporting period, technical assistance has focused on revision to the Total Coliform Rule, revisions to operator regulations, revisions to state regulations (including, but not limited to Permit Regulations), *Legionella* and micro-biological control, lead in drinking water, water loss accounting, as well as a myriad of other regulatory concerns. Finally, the

Illinois EPA expresses thanks to the efforts of the Southern Illinois University-Edwardsville's Environmental Resources Training Center. The Environmental Resources Training Center is unique to Illinois and their collaboration on the Operator Certification Program, including their hands-on operator training program and assistance in operator test preparation, is invaluable to the citizens of Illinois.

The following documentation provides the reporting criteria for the annual State Capacity Development Program Implementation Report as required by U.S. EPA through guidance from Cynthia Dougherty in her June 1, 2005, Memorandum. The Illinois EPA and Illinois DPH anticipate this information fulfills the annual reporting requirements for Illinois' approved strategy.

New Systems Program Annual Reporting Criteria -

- There have been no modifications to Illinois' legal authority to implement New System Programs.⁸
- There have not been any modifications to Illinois' control points.⁹
- The following data summarizes the Annual new system data for the Capacity Development Program.¹⁰

Annual Report on New Systems Capacity Development Program January 1, 2016 – December 31, 2016	
Method(s) used to evaluate and verify program implementation	Construction and Operating Permits
Number of proposed new CWS	0
Number of proposed new Non-Transient Non-Community Water Supplies (NTNC PWS)	5
Number of approved new CWS	14
Number of approved new NTNC PWS	4
Number of new CWS (commenced operation after October 1, 1999)	115
Number of new CWS (commenced operation after October 1, 2003)	73 ¹¹
Number of CWS that commenced operation after October 1, 2003 that have gone inactive	1

⁸ See *ILLINOIS ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT*, September 30, 2005 at: <http://www.epa.state.il.us/water/field-ops/drinking-water/capacity-development/index.html>. U.S. EPA believes this information will help identify whether States have maintained the necessary authority to implement the new systems program.

⁹ See *ILLINOIS ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT*, September 30, 2005. Each State's New Systems Program identified a set of Control Points, which is an integrated feature of a State's program. A control point identifies a place where the Primacy Agency (or other unit of government) can exercise its authority to ensure the demonstration of new system capacity. States should provide a discussion or a list that explains the modification(s) of control points for new systems, followed by an explanation of how and why the modification(s) have been identified. The explanation should include how the modification(s) is projected to affect the new systems program.

¹⁰ U.S. EPA believes that compilation of compliance data is intended to identify whether there are noncompliance patterns during the first three years of a new system's operation.

¹¹ U.S. EPA has requested the list provided in Appendix D to this Report.

Number of new CWS activated since October 1, 2003 considered to be in “significant non-compliance ¹² ”	0
Number of new NTNC PWS (commenced operation after October 1, 1999)	175
Number of new NTNC PWS (commenced operation after January 1, 2004)	135 ¹³
Number of new NTNC PWS activated since January 1, 2004 considered to in “significant non-compliance”	3
Number of new CWS that are not in compliance, Reason for non-compliance:	0
Number of new NTNC PWS that are not in compliance, (These are mostly Phase II/V and Lead and Copper Rule (LCR) monitoring violations. Owner/Operators are generally new to the Drinking Water Regulations and have difficulty keeping up with the testing schedule and their other job duties.)	22

Existing System Strategy -

- There have been no modifications to Illinois’ existing systems strategy. Both the Illinois EPA and the Illinois DPH utilized existing programs, tools and activities as described in the *ILLINOIS ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT, September 30, 2005*.
- Illinois has continued to identify systems in need of technical, financial and managerial capacity development, as described in the *ILLINOIS ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT, September 30, 2005*, and its Attachments 3 and 4.
- During the reporting period, no statewide PWS capacity concerns or capacity development needs were identified. Over the reporting period, Illinois EPA conducted over 650 Engineering Evaluations (Sanitary Surveys) at CWS and Illinois DPH conducted approximately 213 sanitary surveys at NTNC PWS. Public water system capacity concerns were evaluated during each of these evaluations. The Illinois EPA and DPH find that each system has to be handled on an individual basis and no common trends not previously noted were identified.
- During the reporting period, no revisions or modifications to the implementation strategy for existing system strategy were made.
- The Illinois EPA will continue the current capacity outreach process in Illinois. Generally, groups like the Illinois Rural Water Association, Illinois Section of the American Water Works Association, Illinois Potable Water Supply Operators Association and local operator associations request technical assistance from the Illinois EPA. These requests come in throughout the year and generally focus on areas of concern as they arise or are perceived by the particular interest group. For the Illinois EPA to track this level of detail, we would need to institute a separate tracking system with no purpose other than reporting. At this time, the Illinois EPA-DPWS does not have the resources to institute such a process and is not convinced that doing so would be in the best interest of the State.

¹² For the purpose of this report significant noncompliance corresponds to an Enforcement Tracking Tool score greater than or equal to 11.

¹³ U.S. EPA has requested the list provided in Appendix E to this Report.

- While the Illinois EPA will continue to evaluate the use of various programs to assist CWS in developing capacity, the Agency will continue to work with the training providers mentioned in the previous bullet on these programs, including the Check Up Program for Small Systems. In the future, Illinois training providers may modify the Check Up Program for Small Systems to accommodate the very small systems that struggle most to achieve compliance.
- The Illinois EPA and the Public Water Supply Operator Advisory Board remain concerned that the technical capacity of water systems will be affected by staff attrition resulting from the aging workforce in Illinois. In light of this impending issue, the Illinois EPA has devoted a large resource investment in working with the Board. This effort has resulted in the statutory changes described in the Operator Certification Program description within this chapter.
- In previous program reviews, U.S. EPA has noted that Illinois' Capacity Development Program would benefit from an enhancement to address these financial and managerial capacity issues such as promoting more realistic user rates and budget planning for current and long term needs. While the Illinois EPA agrees with this conceptually, it can be difficult influencing water supplies with respect to financial capacity. Further, very few water systems are subject to statutory rate setting in Illinois (only privately owned utilities are subject to the Illinois Commerce Commission). Therefore, other than encouraging water systems to act progressively, the Illinois EPA has no authority to require actions beyond our current program.

Cross-Connection Control Program

The DPWS evaluates community water supply cross-connection control programs during routine engineering evaluations of each system. A viable program consists of an ordinance, an ongoing survey of the distribution system service connections, identification of at risk service connections, mitigation of recognized risks via a plumber/CCCDI, and documentation.

To verify the effectiveness of each water system's Cross-Connection Control Program the DPWS FOS normally evaluates the following questions:

- 1) Does the system have a Cross-Connection Control Ordinance?
- 2) Does the system survey the service connections on its distribution system and at what frequency?
- 3) Does the system receive reduced pressure backflow preventer annual test reports?
- 4) Does the system have an adequate tracking procedure whereby test reports and high risk service connections are tracked?
- 5) Does the system ensure that devices within its water treatment facility are properly tested on an annual basis?
- 6) Are there any locations within the water treatment facility that should have backflow protection that do not?

In terms of corrective action, if a system does not have an ordinance, has no information on file relative to a survey of its distribution system, cannot produce reports on reduced pressure backflow devices, or cannot show that devices within its facility have been tested annually, it is safe to say that the system does not have an active and effective program. These situations are normally cited in either a NCA letter or a VN to the water supply as violation(s) of 35 Ill. Adm. Code 607.104(a) and (b). While the Illinois EPA does not track VNs to the level of specificity needed to quantitatively evaluate CWS compliance with this requirement, the Agency can say that compliance has increase dramatically over the past decade and the program is reaching a level of maturity where

almost 100 percent of CWS have ordinances or water use agreements and evaluate high risk activities. The bulk of the noncompliance occurs in tracking routine surveillance of the distribution system. The Illinois EPA believes that these activities are even seeing great improvements.

Source Water Protection Program

To highlight the need for frequent source water protection efforts, U.S. EPA has recognized the importance of an ongoing program to protect ground and surface water sources of PWS subject to the regulatory requirements of the SDWA. As such, two national environmental output

The Illinois EPA continues to monitor for Harmful Algal Blooms (HAB) at a subset of PWS intakes as part of the Ambient Lake Monitoring Program. Illinois EPA biologists collect three HAB samples between the months of June and October at each selected CWS intake. Samples collected as part of the HAB monitoring program are sent to the Illinois EPA Division of Laboratories for analysis of total microcystins and cylindrospermopsin by “Enzyme-Linked Immunosorbent Assay” testing methodology.

measures¹⁴ have been established to assist in measuring the effectiveness of state source water protection programs. With assistance of national stakeholder groups, U.S. EPA has established that over the next two-year reporting cycle (Calendar Years 2016 and 2017) state primary enforcement programs should minimize risk to public health through source water protection for 50 percent of CWS (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy). Additionally, risk to public health should be minimized through source water protection for 42 percent of the population served by CWS (i.e. “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). For the calendar year 2016, 49.6 percent (864 of 1,742) of CWS have minimized risks to public health through substantial implementation of source water protection programs. Additionally, 73.4 percent (8,809,358 of 12,001,850) of the population served by community water systems have source water that has been substantially protected by their respective water systems.

A total of three joint ICCG/GAC meetings were held during the 2016 reporting period. These meetings included discussions on the review and development of recommendations pertaining to draft rules for coal combustion waste surface impoundments at power generating facilities; draft updates to the Illinois Groundwater Quality Standards; status updates regarding the Illinois EPA Nitrate Monitoring Program; and updates on regional water supply planning efforts with the Department of Natural Resources. (See Appendix F and G of this document for a list of publications relevant to ICCG/GAC efforts.)

¹⁴ Strategic Goal 2: Protecting America’s Waters, Strategic Objective 2.1.1: Water Safe to Drink, Grant Code SDW-SP4a and SDW-SP4b.

Permitting Program

The following table summarizes the DPWS permit activity for Calendar Year 2015. It is noteworthy that all permits were issued well within statutory deadlines.

Permits Issued by Illinois EPA's Division of Public Water Supplies for CWS						
Permit Types	Deadlines	Public Hearing Required	Public Notice Required	Calendar Year 2015		
				Applications Received	Permits Issued	Approx. Turn-around time (days)
Construction permits	45/90 Days	No	No	1244	1217	23
Operating permits	90 Days	No	No	996	1045	6
Emergency permits	n/a	No	No	28	24	13
As-built approvals	none	No	No	20	22	44
Aquatic Pesticide/ Algaecide	90 Days	No	No	18	18	16

The PS has also taken the following actions in response to the need for enhanced health protection from lead in drinking water:

- The PS now requires three, six-month rounds of initial lead and copper monitoring following an operating permit that involves a change in source or significant change in treatment. This is an increase above the current requirement of two rounds.
- The PS began placing a special condition on all water main replacement permits that require notice to each service connection regarding precautions that can be taken to minimize the effects of “disturbances” to water consumers.
- All new corrosion control evaluations will have enhanced project tracking.

FEDERAL FISCAL YEAR 2018 AND 2019 ILLINOIS EPA WORK PLAN TO FULFILL PRIMARY ENFORCEMENT AUTHORITY FOR THE PUBLIC WATER SYSTEM SUPERVISION (PWSS) PROGRAM¹⁵

1. **Rules and primacy** - Illinois will continue to maintain primacy for, and implement all of the drinking water rules contained in Appendix H. These rules will continue to be administered by the Illinois EPA and DPH.
 - ⇒ Illinois requested and was granted a 2-year extension, to February 2017, to submit the Revised Total Coliform Rule primacy application.
 - ⇒ Illinois has not yet completed programming to be able to fully report RTCR violations, including Level 1 and 2 assessment information, to SDWIS/State. Non-CWS tracking of RTCR will be evaluated and a plan developed in 2017 to more fully report on this Rule.
 - ⇒ U.S. EPA Region 5 will continue to track state reporting of rule violations.
2. **Sanitary surveys** - Illinois will continue to maintain a baseline core of individuals with the technical expertise needed to perform sanitary surveys.
 - ⇒ Illinois will ensure that sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.
 - ⇒ U.S. EPA Region 5 will track state commitments to conduct sanitary surveys within the federally required intervals.
3. **Laboratory certification** - Illinois will continue to provide an adequate laboratory certification program for all regulated contaminants, at a minimum to certify commercial laboratories within the State.
 - ⇒ Illinois will continue to certify all laboratories that produce results for compliance with SDWA at least once every three years and will meet all regulatory requirements.
 - ⇒ Illinois EPA's Division of Laboratories will maintain a certification program and a certified State Lab for inorganic and organic contaminants of concern.
 - ⇒ Illinois DPH will maintain a certification program and a certified State Lab for bacteriologic contaminants of concern.
 - ⇒ Illinois EPA and DPH will submit annual questionnaires to U.S. EPA Region 5.
 - ⇒ U.S. EPA Region 5 will track state commitments to conduct laboratory certification activities by the Illinois DPH and the Illinois EPA's Division of Laboratories.
4. **Compliance and enforcement management** - Illinois EPA and DPH will maintain an adequate enforcement and compliance assistance program. Illinois and U.S. EPA Region 5 will continue to implement data exchange to ensure that enforcement resources are targeted at the right PWSs.
 - ⇒ Illinois (EPA & DPH) will continue to address all systems not in compliance with state rule and regulation. Specifically, Illinois will address non-compliant PWSs that have a score of 11 or higher on the U.S. EPA's Enforcement Targeting Tool report.
 - ⇒ As an enforcement option, Illinois will continue to refer noncompliant PWSs to the U.S. EPA Region 5 for follow-up action.

¹⁵ Work Plan commitments are negotiated as part of the Illinois EPA/U.S. EPA Performance Partnership Agreement. These agreements cover a two-year time frame that is based on the Federal Fiscal Year beginning in October. Therefore, these agreements overlap with the calendar year being reported on within this report.

- ⇒ U.S. EPA Region 5 will track state commitments under measure SDWA02 (involving addressing with a formal enforcement action or return to compliance, the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July Enforcement Targeting Tool report, and update Illinois quarterly.
- 5. **Data management and reporting** - Illinois EPA and DPH maintain adequate data management systems (and updates it for new rules, and new versions of FedRep) that tracks requirements for all rules, which includes the appropriate combination of hardware, software, and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN, and public information requirements.
 - ⇒ Illinois EPA and DPH will continue to report to U.S. EPA actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15.
 - ⇒ Illinois EPA and DPH utilizes SDWIS/State to manage water system compliance with all regulatory compliance concerns.
 - ⇒ As noted previously, Illinois EPA has not yet completed programming to be able to fully report RTCR violations, including Level 1 and 2 assessment information, to SDWIS/State. Non-CWS tracking of RTCR by IDPH will be evaluated and a plan developed in 2017 to more fully report on this Rule.
 - ⇒ U.S. EPA Region 5 will track quarterly and annual data reporting requirements.
- 6. **Operator certification** - Illinois will continue to maintain regulations for the operation and maintenance of all public water systems by properly certified individuals.
 - ⇒ Illinois will continue to report to U.S. EPA the status of the operator certification program on an annual basis.
 - ⇒ U.S. EPA Region 5 will track completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.
- 7. **Capacity development** - Illinois will continue to work with existing PWSs and require capacity demonstrations for new PWSs to enhance water system technical, managerial, and financial capacity to operate in compliance with federal and state regulations.
 - ⇒ Illinois EPA and DPH will continue to report to U.S. EPA the status of the Illinois Capacity Development Program on an annual basis.
 - ⇒ U.S. EPA Region 5 will track completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.
- 8. **Source water assessments and protection** - Illinois will continue to report the number of CWSs with source water protection (SWP) plans and the number of CWSs implementing SWP measures electronically via SDWIS.
 - ⇒ Illinois will continue to update source water assessments, as resources allow, and complete source water assessment reports for new public water systems
 - ⇒ U.S. EPA Region 5 will continue track the Source Water Assessment and Protection Program through SDWIS and other State and Federal Reports.
- 9. **Measures and Indicators** - Illinois will continue to use quantitative measures developed by U.S. EPA Region 5 to regularly assess program performance.

- ⇒ Illinois will continue to participate in semi-annual conference calls with U.S. EPA Region 5 to discuss national program measures, Region 5 specific shared goals and special high priority queries.
- ⇒ Illinois will continue to provide information regarding lead action level exceedances upon request from U.S. EPA Region 5.
- ⇒ U.S. EPA Region 5 will continue to track the status of the Illinois Drinking water program with respect to national program measures, Region 5 specific shared goals and special high priority queries.
- ⇒ For Calendar Year 2017, a special high priority area of focus will continue to be the public health concerns related to Lead and Copper Rule (LCR) implementation.
- ⇒ The U.S. EPA Region 5, Illinois EPA and DPH will conduct a data and enforcement verification audit in Calendar Year 2017.

FUTURE DIRECTIONS

Illinois Environmental Protection Agency

Division of Public Water Supplies (DPWS) Manager's Initiatives

The DPWS has completed a comprehensive review of current regulations promulgated by the IPCB and JCAR. This process should culminate with a final IPCB regulatory proposal during 2017 regarding the design, operations and maintenance of community water supplies.

The DPWS will continue to support and review legislative proposals to enhance drinking water protection in Illinois. Additionally, the DPWS will continue to support statutorily established committees, councils and boards. These include, but are not limited to the ICCG, the GAC, four Regional Groundwater Protection Committees and the PWS Operator's Advisory Board.

During 2017, the Illinois EPA will continue to implement the expanded HAB monitoring effort. Additional reservoirs used as PWS sources will be assessed by the Ambient Lake Monitoring Program of the BOW.

Field Operations Section

FOS helps achieve the DPWS key outcome measure of *percent population served with good quality drinking water from CWS*, in addition to the output measure of *conduct engineering evaluations every 3 years at CWS*. Attrition and budget constraints have resulted in three staff vacancies. These vacancies include the Section Manager and two regional office engineers.

2017 Objectives: The FOS will also work to maintain current inspection goals and provide emergency and technical assistance to CWS as necessary. Additionally, FOS will continue to support other BOW and DPWS programs including, but not limited to the Operator Certification, Capacity Development and Cross-Connection Control Programs.

As part of routine engineering evaluations/sanitary surveys of water systems, field engineers will begin initiating a process to verify that the water quality parameter ranges are being met on a daily basis. The Illinois EPA recognizes that water treatment operation is just as important as design when it comes to maintaining water quality. Additionally, inspectors will begin evaluating water service line materials inventories in preparation for revisions to the Lead and Copper Rule and advised by U.S. EPA.

Compliance Assurance Section

The CAS helps achieve the Division's key outcome measure of *percent population served with good quality drinking water from CWS* and *percent of CWS serving good quality drinking water*. The CAS has necessarily used a strategic planning approach for implementation of programs for the past 10 years. This process includes cross-training of all staff for rule implementation and programmatic corrective actions. Additionally, the CAS has assisted the Division Manager since the Cross-Connection Control and Capacity Development Program Coordinator vacancy has existed for an extended time.

2017 Objectives: The CAS will continue integration of the Operator Certification, Capacity Development and Cross-Connection Control Programs into base activities to optimize staff resources. Additionally, CAS is in the process of working with IT staff on several data systems including the operator certification data system, updating a web service to track operator certification status, the transition of the existing state and federal SDWIS to SDWIS Prime (supported by the “cloud”) and local data systems.

In response to the concern for lead in drinking water, the CAS is evaluating processes to:

- Follow up with water supplies on all individual user results above 15 ug/L and encourage either lead service line replacement, replacement of premise plumbing that contains lead, or improved corrosion control treatment at the water treatment plant.
- Explore financing opportunities to encourage lead service line replacement including, but not limited to, replacement of lead service as an eligible expense under the drinking water revolving loan fund.

Permit Section

The PS continues to assist the Division in achieving the key outcome measure of ***percent population served with good quality drinking water from CWS***. Because of the current economic downturn, modernization of the Permit Database and streamlining strategies, the PS has been able to meet current work-loads.

2017 Objectives: The PS will continue to evaluate the business processes to further streamline and automate certain functions to maintain current work activities to issue construction and operating permits. Furthermore, they will continue to support other BOW and DPWS programs including, but not limited to the Operator Certification, Capacity Development and Cross-Connection Control Programs.

In response to the concern for lead in drinking water the PS is evaluating processes to:

- Continue a review of corrosion control treatment practices at water systems with highest vulnerability to lead corrosion and with greatest populations served.
- Initiate an audit of lead sampling design (Tier I sites): The Illinois EPA intends to begin a process to audit sites as resources allow. The Agency is currently considering use of Geographical Information System technology to aid in this process.

Groundwater Section

As with the FOS and PS, the GWS assists the Division in achieving the key outcome measure of ***percent population served with good quality drinking water from CWS***, in addition to the output measures associated with ***enhancing source water protection programs at CWS***. The GWS continues to use the strategic planning approach for implementation of various program activities. These strategic plans are developed with input from the ICCG, GAC, and priority groundwater protection planning committees. Starting with the *Illinois Groundwater Protection Act Biennial Report* published 1998, the DPWS began setting objectives and implementing tactical plans based on a self-assessment of metrics.

2017 Objectives: The GWS will continue the measured outcome metric of *good quality groundwater*, from previous planning cycles. Further, the Section will continue groundwater monitoring efforts in 2017 with emphasis on assessment of nitrate contamination in groundwater. The GWS will also continue support of BOW programs including, but not limited to the Mine Pollution Control Program and Water Pollution Control Permit Program.

The following groundwater protection efforts initiated in 2016 will continue in 2017 based on the results of the self-assessment and environmental indicators. In some tasks, the priority may be shifted due to funding constraints.

Interagency Coordinating Committee on Groundwater Operations

- Continue to review and update the Implementation Plan and Regulatory Agenda.
- Continue to assist the Groundwater Advisory Council in the review and development of recommendations pertaining to groundwater quality and quantity issues.
- Continue the policy discussion concerning the integration of wellhead protection areas with Tiered Approach for Corrective Action Objectives.
- Continue geothermal and closed loop well regulation.
- Continue investigation into the ability of Illinois Department of Public Health to track and register groundwater monitoring wells.
- Continue coordinating on regional groundwater quantity planning and climate resiliency.

Groundwater Advisory Council Operations

- Conduct policy-related meetings in order to review and make recommendations regarding groundwater issues and policies.
- Provide input to programs, plans, regulatory proposals, and reports, as appropriate.

Education Program for Groundwater Protection

- Conduct source water protection workshops.
- Integrate groundwater education efforts (including geothermal and closed loop wells) into other state environmental planning and protection programs.

Groundwater Evaluation Program

- Continue to conduct basic and applied groundwater research programs that allow decisions to be made on sound scientific principles.
- Continue to update source water assessment fact sheets with information from Right-to-Know, Groundwater Rule evaluations, and field inspections.
- Continue ambient groundwater monitoring programs at Illinois EPA and Illinois Department of Agriculture pursuant to the Act, IGPA and State Pesticide Management Plan, respectively.
- Assess nitrates in groundwater in relation to Illinois Nutrient Loss Reduction Strategy.

Groundwater Enforcement Cases

- Provide expertise in groundwater water related enforcement cases.

Right-to-Know Initiatives

- Continue efforts of providing notification for potable resource groundwater users threatened by groundwater contamination.
- Continue efforts of implementing the carcinogenic Volatile Organic Compound Maximum Contaminant Level prevention law.
- Continue efforts of providing notification for potable resource groundwater users threatened by groundwater contamination.

Groundwater Quality Regulations

- Continue with proposed changes to the groundwater quality standards and continue efforts of protecting future beneficial uses of drinking water.

Coal Ash Regulations

- Provide amendments to 35 Ill. Adm. Code 841.

Wellhead Protection Program

- Continue to amend rules to require the development of source water protection planning.
- Continue to integrate groundwater into watershed plans.

Regional Groundwater Protection Planning Program

- Continue to assist and advocate local groundwater protection, education, and marketing.

Groundwater Technical Review of Bureau of Water Permits

- Provide input on protective design and appropriate groundwater monitoring systems.

Groundwater Management Zones - Bureau of Water Permits

- Review and approve corrective action and closure under a GMZ.

Non-Community and Private Well Program

- Continue to implement the Wellhead Protection Program and assist with implementing the technology control and groundwater quality standards regulations.
- Continue the source water assessments for new non-community public water supplies.
- Continue GIS coverage for all new non-community public water supplies.
- Continue certification training of non-transient non-community public water supply operators.
- Continue to inspect and perform laboratory analyses on water samples collected from non-community public water supplies.
- Continue to issue permits for the construction, modification or extension of existing non-community public water supplies.
- Continue the issuance of permits for all types of water wells with the exception of community water supply wells.
- Continue to update the Illinois Water Well and Pump Installation Codes to reflect new technology, industry, and public health standards.
- Continue supporting education training sessions for licensed water well and pump installation contractors.
- Continue the certification and registration of closed loop well contractors.
- Continue the permitting and inspection of the construction of close loop well systems.

- Continue supporting education training sessions for licensed water well and pump installation contractors.
- Continue to conduct training sessions pertaining to both the non-community public water supply and private-water program for local health department and Illinois Department of Public Health water program staff.
- Continue implementation of Public Notification for Private Water Supply Potential Contamination.
- Continue implementation of the Safe Drinking Water Information System database for compliance monitoring of non-community public water supplies.

Administrative Support Unit

The role of this small unit cannot be underestimated. The group assists all aspects of the Division. Through attrition, the Division is down to two full time staff. At this time, the Division is unsure how this functionality will continue.

2017 Objectives: The DPWS will have to develop a continuity of operation plan to address what may be a large shortage of administrative support in 2017 and beyond.

Illinois Department of Public Health

Illinois DPH

The Illinois DPH continues to administer the NCPWS Program, protecting public health of the 484,819 population served by NCPWS. Illinois DPH continues doing program work in the Central Office with only two full time employees. These employees do Plan Review, Federal Reporting, Compliance Assurance for all Non-Transient Systems with IOCs, VOCs, SOCs, Lead and Copper Rule, Arsenic, Disinfection/ Disinfection Byproducts Rule and Surface Water Rule (T and NT). Additional duties include SDWIS administration including data migration and compliance decision support checks. These two positions further provide training of local health department staff, adopt new rules and develop program policies.

2017 Objectives:

Resources: Two vacancies continue to exist in the NCPWS Program. Efforts will continue to be made to fill these vacancies as Division of Environmental Health priorities and funding opportunities allow. The Program was able to get some assistance in 2016 using contractor help, but the Program cannot be properly administered long-term without filling these two vacancies. This would constitute a fully staffed program under current established positions.

Reporting of Coliform and Nitrate Violations: As noted in on-going discussions with U.S. EPA, reporting of coliform and nitrate violations fell off in 2012 and 2013 due to loss of a staff position. However, some gains were made in 2014 and 2015 with the help of some contractor support and re-prioritization of duties. Efforts to restore contractor help were again successful for 2016 and more gains were made towards closing the gap of complete reporting. Of particular note, was the upgrade to SDWIS/State version 3.33.

Illinois DPH will make every effort to run Total Coliform Rule and Nitrate compliance determination in SDWIS/State in 2017 so that complete reporting can be achieved. IDPH hopes to accomplish this with the following initiatives: 1. Working to ensure the SDWIS modules for the RTCR and the GW Rule are properly installed and working; 2. again hiring a part-time contractor experienced with SDWIS implementation to help get the RTCR and GW Rule Compliance modules up and running; 3. working with major Illinois private labs to report Nitrate data with electronic files for SDWIS Migration; and 4. working with the IDPH lab to provide lab to state Coliform files for migration into SDWIS.

It should be noted Illinois DPH ROs and LHDs are monitoring for compliance and protecting public health when MCLs are exceeded. Central office program staff have not had the resources over the last five years to run the compliance determination through SDWIS/State to verify the work performed in the field and completely report all violations, particularly all monitoring violations.

Revised Total Coliform Rule Adoption: The Illinois DPH is adopting an alternative RTCR for NCPWS in 77 Ill. Admin. Code Part 900 of the Public Health Rules. Illinois DPH is working closely with U.S. EPA Region V program staff on this proposed rule. This rule is more stringent than the federal rule and makes more efficient use of State and LHD resources. Along with rule adoption, program policies and reporting forms are being revised and updated to provide more consistency in the NCPWS Program. Illinois DPH has made changes to the draft rule requested by Region V and has submitted Special Primacy Requirements to Region V as requested via letter dated February 19, 2016. Illinois DPH continues awaiting approval of these Special Primacy Requirements to begin the formal rule-making process of adopting the alternative RTCR for NCPWS. As of April 1, 2016, Illinois NCPWS are subject to the federal RTCR as adopted in 35 Ill. Admin. Code Part 611 of the Illinois Pollution Control Board Rules until the Part 900 rules are adopted.

2017 Objectives: (Cont'd)

Lead and Copper Rule: The Illinois DPH conducts a thorough review of sample results at NTNC PWS with special emphasis on schools and daycares. The Illinois DPH reviewed and revised sample site selection criteria and sampling protocol in 2016. These documents were revised based on sampling protocol recommendations from U.S. EPA following Flint and ensure sample site locations represent the highest level of health protection based on the criteria of human consumption and “worst case” risk for lead leaching. Illinois DPH included these documents in a quarterly sample schedule letter sent to all NTNC PWS in June 2016 and requested that all systems re-submit a sample site plan prior to their next Lead/Copper sampling event. All Lead and Copper sampling in 2017 should be conducted following the revised sample site collection criteria and sampling protocol.

IDPH has a lead role in implementing the new Lead Mitigation in Schools law. IDPH is required to receive and review all the Lead data that is submitted by Illinois schools. Consequently, numerous man hours were required by the Non-Community Program staff in response to inquiries about the law and implementation issues. The NCPWS Program staff’s experience and knowledge with the LCR were needed for these tasks. Unfortunately, the numerous hours spent on this new law by NCPWS staff resulted in delays in providing Lead Action Level updates to U.S. EPA in 2016. Every effort will be made to eliminate these delays in 2017.

Appendix A
Illinois EPA Annual Compliance Report
Calendar Year 2016
SDWA Contaminant Listing

Community Water Supplies

Contaminant Code	Contaminant	Rule Family	Violation Category	# of Violations	# of Resolved Violations	# of CWS in Violation
3014	E. COLI	GWR	Monitoring and Reporting	1	1	1
1005	Arsenic	IOC	Maximum Contaminant Level Violation	16	1	6
1010	Barium	IOC	Maximum Contaminant Level Violation	2	2	1
1040	Nitrate	IOC	Maximum Contaminant Level Violation	7	3	4
1040	Nitrate	IOC	Monitoring and Reporting	5	0	5
1041	Nitrite	IOC	Maximum Contaminant Level Violation	1	1	1
1041	Nitrite	IOC	Monitoring and Reporting	2	1	2
5000	Lead and Copper Rule	LCR	Monitoring and Reporting	32	18	30
5000	Lead and Copper Rule	LCR	Treatment Technique Violation	9	4	8
4000	Gross Alpha, Excl. Radon and U	Rads	Maximum Contaminant Level Violation	1	0	1

Contaminant Code	Contaminant	Rule Family	Violation Category	# of Violations	# of Resolved Violations	# of CWS in Violation
4010	Combined Radium (-226 and -228)	Rads	Maximum Contaminant Level Violation	30	4	10
4010	Combined Radium (-226 and -228)	Rads	Monitoring and Reporting	10	7	8
4006	Combined Uranium	Rads	Monitoring and Reporting	4	3	3
0999	Chlorine	St2 DBP	Monitoring and Reporting	31	25	29
1006	Chloramine	St2 DBP	Monitoring and Reporting	12	11	11
1009	Chlorite	St2 DBP	Monitoring and Reporting	1	1	1
2456	Total Haloacetic Acids (HAA5)	St2 DBP	Maximum Contaminant Level Violation	15	11	9
2456	Total Haloacetic Acids (HAA5)	St2 DBP	Monitoring and Reporting	13	3	13
2950	TTHM	St2 DBP	Maximum Contaminant Level Violation	12	3	5
2950	TTHM	St2 DBP	Monitoring and Reporting	12	2	12
0300	IESWTR	SWTRules	Treatment Technique Violation	2	2	1
0300	IESWTR	SWTRules	Monitoring and Reporting	6	4	3
3100	Coliform (TCR)	TCR	Maximum Contaminant Level Violation	13	5	6

Contaminant Code	Contaminant	Rule Family	Violation Category	# of Violations	# of Resolved Violations	# of CWS in Violation
3100	Coliform (TCR)	TCR	Monitoring and Reporting	6	2	3
8000	Coliform (RTCR)	Revised Total Coliform Rule	Maximum Contaminant Level Violation	3	3	3
8000	Coliform (RTCR)	Revised Total Coliform Rule	Monitoring and Reporting	15	13	13
8000	Coliform (RTCR)	Revised Total Coliform Rule	Public Notification	1	1	1
7500	Public Notice (PN)	PN	Consumer Awareness	58	26	35
7000	Consumer Confidence Report	CCR	Consumer Awareness	65	64	65
2946	Ethylene Dibromide	SOC	Monitoring and Reporting	3	1	3
2032	Diquat	SOC	Monitoring and Reporting	3	1	3
2033	Endothall	SOC	Monitoring and Reporting	3	1	3
2034	Glyphosate	SOC	Monitoring and Reporting	1	0	1
2035	Di(2-ethylhexyl) adipate	SOC	Monitoring and Reporting	6	1	6
2036	Oxamyl	SOC	Monitoring and Reporting	2	1	2
2037	Simazine	SOC	Monitoring and Reporting	5	1	5

Contaminant Code	Contaminant	Rule Family	Violation Category	# of Violations	# of Resolved Violations	# of CWS in Violation
2039	Di(2-ethylhexyl) phthalate	SOC	Monitoring and Reporting	5	1	5
2040	Picloram	SOC	Monitoring and Reporting	2	1	2
2041	Dinoseb	SOC	Monitoring and Reporting	2	1	2
2042	Hexachlorocyclopentadiene	SOC	Monitoring and Reporting	2	1	2
2043	Aldicarb Sulfoxide	SOC	Monitoring and Reporting	2	1	2
2044	Aldicarb Sulfone	SOC	Monitoring and Reporting	2	1	2
2046	Carbofuran	SOC	Monitoring and Reporting	3	1	3
2047	Aldicarb	SOC	Monitoring and Reporting	2	1	2
2050	Atrazine	SOC	Monitoring and Reporting	6	1	6
2051	Lasso	SOC	Monitoring and Reporting	6	1	6
2065	Heptachlor	SOC	Monitoring and Reporting	3	1	3
2067	Heptachlor Epoxide	SOC	Monitoring and Reporting	3	1	3
2105	2,4-D	SOC	Monitoring and Reporting	3	1	3

Contaminant Code	Contaminant	Rule Family	Violation Category	# of Violations	# of Resolved Violations	# of CWS in Violation
2110	2,4,5-TP	SOC	Monitoring and Reporting	3	1	3
2274	Hexachlorobenzene	SOC	Monitoring and Reporting	2	1	2
2306	Benzo(a)pyrene	SOC	Monitoring and Reporting	5	1	5
2326	Pentachlorophenol	SOC	Monitoring and Reporting	3	1	3
2383	PCBs	SOC	Monitoring and Reporting	3	1	3
2931	1,2-Dibromo-3-chloropropane	SOC	Monitoring and Reporting	3	1	3
2959	Chlordane	SOC	Monitoring and Reporting	4	1	4
2031	Dalapon	SOC	Monitoring and Reporting	2	1	2
2015	Methoxychlor	SOC	Monitoring and Reporting	3	1	3
2020	Toxaphene	SOC	Monitoring and Reporting	3	1	3
2005	Endrin	SOC	Monitoring and Reporting	2	1	2
2010	BHC-Gamma	SOC	Monitoring and Reporting	3	1	3

*Illinois DPH Annual Compliance Report
Calendar Year 2016
Summary NCPWS*

Volatile Organic Chemicals (VOCs)								
Code	Name	MCL (mg/l)	MCLs			Monitoring		
			# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
2977	1,1-Dichloroethylene	0.007	0	0	0	63	36	38
2981	1,1,1-Trichloroethane	0.2	0	0	0	63	36	38
2985	1,1,2-Trichloroethane	0.005	0	0	0	63	36	38
2980	1,2-Dichloroethane	0.005	0	0	0	63	36	38
2983	1,2-Dichloropropane	0.005	0	0	0	63	36	38
2378	1,2,4-Trichlorobenzene	0.07	0	0	0	63	36	38
2990	Benzene	0.005	0	0	0	63	36	38
2982	Carbon Tetrachloride	0.005	0	0	0	63	36	38
2380	Cis-1,2-Dichloroethylene	0.07	0	0	0	63	36	38
2964	Dichloromethane (Methylene Chloride)	0.005	0	0	0	63	36	38
2992	Ethylbenzene	0.7	0	0	0	63	36	38
2989	Monochlorobenzene (Chlorobenzene)	0.1	0	0	0	63	36	38
2968	o-Dichlorobenzene	0.6	0	0	0	63	36	38
2969	p-Dichlorobenzene	0.075	0	0	0	63	36	38
2996	Styrene	0.1	0	0	0	63	36	38
2987	Tetrachloroethylene	0.005	0	0	0	63	36	38
2991	Toluene	1	0	0	0	63	36	38
2979	Trans-1,2-Dichloroethylene	0.1	0	0	0	63	36	38
2984	Trichloroethylene	0.005	0	0	0	63	36	38
2955	Xylenes, Total	10	0	0	0	63	36	38
2976	Vinyl Chloride	0.002	1	1	1	63	36	38
VOC Totals			1	1	1	1,323	756	38

Synthetic Organic Chemicals (SOCs)								
Code	Name	MCL (mg/l)	MCLs			Monitoring		
			# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
2931	1,2 Dibromo-3-Chloropropane (DBCP)	0.0002	0	0	0	60	28	38
2105	2,4-D	0.07	0	0	0	60	28	38
2063	2,3,7,8-TCDD (Dioxin)	3x10-8	-	-	-	-	-	-
2110	2,4,5-TP (Silvex)	0.05	0	0	0	60	28	38
2051	Alachlor (Lasso)	0.002	0	0	0	60	28	38
2047	Aldicarb	NA	-	-	-	-	-	-
2044	Aldicarb Sulfone	NA	-	-	-	-	-	-
2043	Aldicarb Sulfoxide	NA	-	-	-	-	-	-
2050	Atrazine	0.003	0	0	0	60	28	38
2306	Benzo (A) Pyrene	0.0002	0	0	0	19	15	8
2010	BHC-gamma (Lindane)	0.0002	0	0	0	60	28	38
2046	Carbofuran	0.04	0	0	0	60	28	38
2959	Chlordane	0.002	0	0	0	60	28	38
2031	Dalapon	0.2	0	0	0	19	15	8
2035	Di(2-Ethylhexyl) Adipate	0.4	0	0	0	19	15	8
2039	Di(2-Ethylhexyl) Phthalate	0.006	0	0	0	20	15	9
2041	Dinoseb	0.007	0	0	0	19	15	8
2032	Diquat	0.02	0	0	0	39	18	28
2033	Endothall	0.1	0	0	0	39	18	28
2005	Endrin	0.002	0	0	0	19	15	8
2946	Ethylene Dibromide (EDB)	0.00005	0	0	0	60	28	38
2034	Glyphosate	0.7	0	0	0	39	18	28
2065	Heptachlor	0.0004	0	0	0	60	28	38
2067	Heptachlor Epoxide	0.0002	0	0	0	60	28	38
2274	Hexachlorobenzene (HCB)	0.001	0	0	0	19	15	8
2042	Hexachlorocyclopentadiene	0.05	0	0	0	19	15	8
2015	Methoxychlor	0.04	0	0	0	60	28	38
2036	Oxamyl (Vydate)	0.2	0	0	0	39	18	28
2326	Pentachlorophenol	0.001	0	0	0	60	28	38
2040	Picloram	0.5	0	0	0	39	18	28

SOCs (cont'd)								
			MCLs			Monitoring		
Code	Name	MCL (mg/l)	# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
2037	Simazine	0.004	0	0	0	42	18	29
2383	Total Polychlorinated Biphenyls (PCB)	0.0005	0	0	0	60	28	38
2020	Toxaphene	0.003	0	0	0	60	28	38
SOC Totals			0	0	0	1,290	648	40
			Treatment Technique			Monitoring		
Code	Name	MCL (mg/l)	# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
2257	Epichlorohydrin	TT	-	-	-	-	-	-
2265	Acrylamide	TT	-	-	-	-	-	-
Totals			-	-	-	-	-	-

Ground Water Rule (GWR)							
Violation Type (code)	Violation Name	# of Violations		# of RTC Violations		# of PWSs In Violation	
31 (0700) & 19 (3002, 3014, 3028)	Monitoring of Treatment (Major Monitoring)	0		0		0	
34 (3014)	Monitoring of Source (Major Monitoring)	2		2		1	
41 (0700)	Failure to Maintain Microbial Treatment - TT	0		0		0	
42 (0700)	Failure to Provide Treatment -TT	0		0		0	
45, 48 (0700)	Failure to Address Deficiency – TT	0		0		0	
		Monitoring			Treatment Technique		
		# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
GWR Totals		2*	2*	1*	0	0	0

Inorganic Chemicals (IOCs)								
Code	Name	MCL (mg/l)	MCLs			Monitoring		
			# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
1074	Antimony, Total	0.006	0	0	0	23	7	23
1005	Arsenic	0.01	7	1	3	45	17	41
1010	Barium	2	0	0	0	24	7	24
1075	Beryllium, Total	0.004	0	0	0	23	7	23
1015	Cadmium	0.005	0	0	0	23	7	23
1020	Chromium	0.1	0	0	0	23	7	23
1024	Cyanide	0.2	0	0	0	23	7	23
1025	Fluoride	4	-	-	-	-	-	-
1035	Mercury	0.002	0	0	0	23	7	23
1040	Nitrate	10	1*	1*	1*	140*	50*	108*
1038	Total Nitrite & Nitrate	10	0*	0*	0*	0*	0*	0*
1041	Nitrite	1	0*	0*	0*	0*	0*	0*
1045	Selenium	0.05	0	0	0	23	7	23
1085	Thallium, Total	0.002	0	0	0	23	7	23
1094	Asbestos	7 MFL	-	-	-	-	-	-
IOC Totals			8*	2*	4*	343*	96*	152*

Coliform (TCR)							
Violation Type	Violation Name	# of Violations		# of RTC Violations		# of PWSs In Violation	
1A	MCL, Ecoli	3*		0*		3*	
21	MCL, Acute	6*		4*		6*	
22	MCL, Monthly	1*		1*		1*	
23, 25	Monitoring Routine & Repeat Major	45*		35*		42*	
3A	Monitoring, Major	11*		1*		10*	
		MCLs			Monitoring		
		# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
TCR Totals		10*	5*	10*	56*	36*	49*

Lead and Copper Rule (LCR)							
Violation Type	Violation Name	# of Violations		# of RTC Violations		# of PWSs In Violation	
51	Monitoring, Initial Tap Sampling for Pb/Cu	13		6		12	
52	Monitoring, Follow-up & Routine Tap Sampling for Pb/Cu	28		4		27	
58	Treatment Installation	0		0		0	
65	Public Education	0		0		0	
		Monitoring			Treatment Technique		
		# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
LCR Totals		41	10	39	-	-	-

Consumer Notification										
Violation Type	Violation Name			# of Violations		# of RTC Violations		# of PWSs In Violation***		
75	Public Notice Rule Reporting			0		0		0		
Stage 1 Disinfectants and Disinfection Byproducts Rule (Stage 1 DBPR)										
Violation Type	Contam Code	Violation Name			# of Violations		# of RTC Violations		# of PWSs In Violation	
12 and 37	0400	Qualified Operator Failure or Failure to Profile/Consult TT			0		0		0	
46	2920	Inadequate DBP Precursor Removal Treatment Technique			0		0		0	
02	1011	Bromate MCL			0		0		0	
02	1009	Chlorite MCL			0		0		0	
02	2456	Total Haloacetic Acids (HAA) MCL			0		0		0	
02	2950	Total Trihalomethanes (TTHM) MCL			0		0		0	
11	0999	Chlorine Maximum Residual Disinfectant Level (MRDL)			0		0		0	
11	1006	Chloramine MRDL			0		0		0	
11	1008	Chlorine Dioxide MRDL			0		0		0	
11	1008	Chlorine Dioxide Monitoring			0		0		0	
13	1008	Chlorine Dioxide MRDL Acute			0		0		0	
27	0400	No DBPR Monitoring Plan			0		0		0	
27	0999	Chlorine Monitoring			0		0		0	
27	1004	Bromide Monitoring			0		0		0	
27	1006	Chloramine Residual Monitoring			0		0		0	
27	1008	Chlorine Dioxide Residual Monitoring			0		0		0	
27	1009	Chlorite Monitoring			0		0		0	
27	1011	Bromate Monitoring			0		0		0	
27	2456	Total Haloacetic Acids (HAA) Monitoring			13		1		13	
27	2920	TOC Monitoring			0		0		0	
27	2950	Total Trihalomethanes (TTHM) Monitoring			13		1		13	
		MCLs/MRDL			Monitoring			Treatment Technique		
		# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
Stage 1 DBPR Totals		0	0	0	26	2	13	0	0	0

2016 State Summary – Non-Community Water Supplies (NCPWS)										
Rule Group	Chemical Sub-Group	MCLs			Monitoring/Notification			Treatment Technique		
		# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation	# of Violations	# of RTC Violations	# of PWSs In Violation
CHEM	VOC	1	1	1	1,323	756	38			
	SOC	0	0	0	1,290	648	40			
	IOC	8*	2*	4*	343*	96*	152*			
CHEM Subtotal		9*	3*	5*	2,956*	1,500*	169**			
TCR Subtotal		10*	5*	10*	56*	36*	49*			
Stage 1 DBPR Subtotal		0	0	0	26	2	13	0	0	0
All SWTRs Subtotal					0	0	0	0	0	0
LCR Subtotal					41	10	39	0	0	0
GWR					2	2	1	0	0	0
Consumer Notification Subtotal					-	-	-			
TOTAL		19*	8*	15*	3,081**	1,550**	219**	0	0	0
Total Number of NCPWSs				Grand Total Number NCPWS Violations (MCL, Monitoring, and Treatment Technique)				Grand Total of NCPWSs in Violation (MCL, Monitoring, and Treatment Technique)		
3,755				3,100**				234**		

* These figures have not been verified with Local health department staff that have direct oversight for these water systems.

** This data is incomplete at this time.

*** Public notice for monitoring violations is not included in the compliance rate.

Appendix B
Illinois EPA 2016 Annual Compliance Report
Maximum Contaminant Level and Treatment Technique Violations by CWS
Sort by Contaminant

Contaminant Name	PWS ID	Community Water System Name	Violation Category	Comment
Arsenic	IL0195925	TRIANGLE MHP	MCL	Under Enforcement
Arsenic	IL0195945	FOUNTAIN VALLEY MHP	MCL	Under Enforcement
Arsenic	IL0730080	HICKORY HILLS 2ND ADDITION WATER ASSN	MCL	Returned to Compliance
Arsenic	IL0735280	LYNWOOD 3RD ADDITION	MCL	Under Enforcement
Arsenic	IL1130450	DANVERS	MCL	Returned to Compliance
Barium	IL1770250	GERMAN VALLEY	MCL	Returned to Compliance
Coliform (TCR)	IL0250200	LOUISVILLE	MCL	Returned to Compliance
Coliform (TCR)	IL0314860	STEGER	MCL	Returned to Compliance
Coliform (TCR)	IL0990900	IL AMERICAN-RANSOM	MCL	Absorbed into Streator
Combined Radium (-226 and -228)	IL0110100	BUDA	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL0150300	SHANNON	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL0370200	HINCKLEY	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL0730300	CAMBRIDGE	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL0890450	HAMPSHIRE	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL0935150	FOX LAWN HOMEOWNERS WATER ASSOCIATION	MCL	Under Enforcement

Contaminant Name	PWS ID	Community Water System Name	Violation Category	Comment
Combined Radium (-226 and -228)	IL0990900	IL AMERICAN-RANSOM	MCL	Absorbed into Streator
Combined Radium (-226 and -228)	IL0995365	COUNTRY ACRES MHP (LA SALLE COUNTY)	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL1410500	ROCHELLE	MCL	Under Enforcement
Combined Radium (-226 and -228)	IL1450050	CUTLER	MCL	Under Enforcement
Gross Alpha	IL0935150	FOX LAWN HOMEOWNERS WATER ASSOCIATION	MCL	Under Enforcement
Interim Enhanced Surface Water Treatment Rule	IL1450150	PINCKNEYVILLE	TT	Returned to Compliance
Lead and Copper Rule	IL0190850	SIDNEY	TT	Returned to Compliance
Lead and Copper Rule	IL0310210	BERWYN	TT	Returned to Compliance
Lead and Copper Rule	IL0710050	BIGGSVILLE	TT	Returned to Compliance
Lead and Copper Rule	IL0735600	GENESEO HILLS SUBDIVISION	TT	Under Enforcement
Lead and Copper Rule	IL1170010	SCOTTVILLE RURAL WATER COMPANY, INC.	TT	Under Enforcement
Lead and Copper Rule	IL1570450	RED BUD	TT	Under Enforcement
Lead and Copper Rule	IL2035300	OAK RIDGE SANITARY DISTRICT	TT	Returned to Compliance
Nitrate	IL0010400	LIMA	MCL	Returned to Compliance
Nitrate	IL1075145	MORNINGSIDE MOBILE ESTATES MHP	MCL	Returned to Compliance
Nitrate	IL1150100	BLUE MOUND	MCL	Returned to Compliance
Nitrate	IL1330200	MAEYSTOWN	MCL	Under Enforcement
Nitrite	IL1614260	COAL VALLEY	MCL	Returned to Compliance

Contaminant Name	PWS ID	Community Water System Name	Violation Category	Comment
Revised Total Coliform Rule	IL0590250	OMAHA	MCL	Returned to Compliance
Revised Total Coliform Rule	IL0630550	MINOOKA	MCL	Returned to Compliance
Revised Total Coliform Rule	IL1975105	CRISWELL COURT MHP	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL0050100	MULBERRY GROVE	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL0190300	HOMER	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL0195925	TRIANGLE MHP	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL0610150	GREENFIELD	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL0670450	LAHARPE	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL1570600	SPARTA	MCL	Under Enforcement
Total Haloacetic Acids (HAA5)	IL1610300	HAMPTON	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL1795780	NORTH TAZEVELL PWD	MCL	Returned to Compliance
Total Haloacetic Acids (HAA5)	IL2034450	GOODFIELD	MCL	Returned to Compliance
TTHM	IL0195925	TRIANGLE MHP	MCL	Returned to Compliance
TTHM	IL0690150	ROSICLARE	MCL	Returned to Compliance
TTHM	IL1090010	NEW SALEM PWD	MCL	Under Enforcement
TTHM	IL1795780	NORTH TAZEVELL PWD	MCL	Returned to Compliance
TTHM	IL1815550	SHAWNEE VALLEY PWD	MCL	Under Enforcement

*Illinois DPH 2016 Annual Compliance Report
Maximum Contaminant Level and Treatment Technique Violations by NCPWS
Sort by Contaminant*

ID	Non Community Water Supply Name	Contaminant Name	Violation Category	Comment
IL3133694	PRINCETON CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3133694	PRINCETON CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3147652	CORNERSTONE CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3147652	CORNERSTONE CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3147652	CORNERSTONE CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3147652	CORNERSTONE CHRISTIAN ACADEMY	ARSENIC	MCL, AVERAGE	NO SOX
IL3156737	ILLINOIS MARINE TOWING INC	ARSENIC	MCL, AVERAGE	RETURNED TO COMPLIANCE
IL3139097	AUX SABLE LIQUID PRODUCTS	COLIFORM (TCR)	MCL ACUTE	RETURNED TO COMPLIANCE
IL3149831	BARRINGTON HILLS FIRE DEPT	COLIFORM (TCR)	MCL ACUTE	NO SOX
IL3112128	BIG ROCK FOOD MART	COLIFORM (TCR)	MCL ACUTE	NO SOX
IL3120352	BOTTUMS UP	COLIFORM (TCR)	MCL ACUTE	RETURNED TO COMPLIANCE
IL3093666	BUFFALO ROCK STATE PARK	COLIFORM (TCR)	MCL ACUTE	RETURNED TO COMPLIANCE
IL3137422	CALAMITY JANES	COLIFORM (TCR)	MCL ACUTE	RETURNED TO COMPLIANCE
IL3053157	CEDAR PATH NURSERIES	COLIFORM (TCR)	MCL MONTHLY	RETURNED TO COMPLIANCE
IL3040410	BRER RABBITT MOTEL	E. COLI	MCL, E.COLI POS (1A)	NO SOX
IL3093047	SCAPECCHIS	E.COLI	MCL, E.COLI POS (1A)	NO SOX
IL3150235	NAPERVILLE C.C. MAINTENANCE	E. COLI	MCL, E.COLI POS (1A)	NO SOX
IL3120642	LAWRENCEVILLE ROD AND GUN CLUB	NITRATE	MCL, SINGLE SAMPLE	RETURNED TO COMPLIANCE
IL3132076	HERITAGE ENVIRONMENTAL	VINYL CHLORIDE	MCL, AVERAGE	RETURNED TO COMPLIANCE

Appendix C
Illinois EPA 2016 Annual Compliance Report
Maximum Contaminant Level and Treatment Technique Violations
Sort by CWS

PWS ID	Community Water System Name	Contaminant Name	Violation Category	Comment
IL0010400	LIMA	Nitrate	MCL	Returned to Compliance
IL0050100	MULBERRY GROVE	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL0110100	BUDA	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0150300	SHANNON	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0190300	HOMER	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL0190850	SIDNEY	Lead and Copper Rule	TT	Returned to Compliance
IL0195925	TRIANGLE MHP	Arsenic	MCL	Under Enforcement
IL0195925	TRIANGLE MHP	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL0195925	TRIANGLE MHP	TTHM	MCL	Returned to Compliance
IL0195945	FOUNTAIN VALLEY MHP	Arsenic	MCL	Under Enforcement
IL0250200	LOUISVILLE	Coliform (TCR)	MCL	Returned to Compliance
IL0310210	BERWYN	Lead and Copper Rule	TT	Returned to Compliance

PWS ID	Community Water System Name	Contaminant Name	Violation Category	Comment
IL0314860	STEGER	Coliform (TCR)	MCL	Returned to Compliance
IL0370200	HINCKLEY	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0590250	OMAHA	Revised Total Coliform Rule	MCL	Returned to Compliance
IL0610150	GREENFIELD	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL0630550	MINOOKA	Revised Total Coliform Rule	MCL	Returned to Compliance
IL0670450	LAHARPE	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL0690150	ROSICLARE	TTHM	MCL	Returned to Compliance
IL0710050	BIGGSVILLE	Lead and Copper Rule	TT	Returned to Compliance
IL0730080	HICKORY HILLS 2ND ADDITION WATER ASSN	Arsenic	MCL	Returned to Compliance
IL0730300	CAMBRIDGE	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0735280	LYNWOOD 3RD ADDITION	Arsenic	MCL	Under Enforcement
IL0735600	GENESEO HILLS SUBDIVISION	Lead and Copper Rule	TT	Under Enforcement
IL0890450	HAMPSHIRE	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0935150	FOX LAWN HOMEOWNERS WATER ASSOCIATION	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL0935150	FOX LAWN HOMEOWNERS WATER ASSOCIATION	Gross Alpha	MCL	Under Enforcement

PWS ID	Community Water System Name	Contaminant Name	Violation Category	Comment
IL0990900	IL AMERICAN-RANSOM	Coliform (TCR)	MCL	Absorbed into Streator
IL0990900	IL AMERICAN-RANSOM	Combined Radium (-226 and -228)	MCL	Absorbed into Streator
IL0995365	COUNTRY ACRES MHP (LA SALLE COUNTY)	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL1075145	MORNINGSIDE MOBILE ESTATES MHP	Nitrate	MCL	Returned to Compliance
IL1090010	NEW SALEM PWD	TTHM	MCL	Under Enforcement
IL1130450	DANVERS	Arsenic	MCL	Returned to Compliance
IL1150100	BLUE MOUND	Nitrate	MCL	Returned to Compliance
IL1170010	SCOTTVILLE RURAL WATER COMPANY, INC.	Lead and Copper Rule	TT	Under Enforcement
IL1330200	MAEYSTOWN	Nitrate	MCL	Under Enforcement
IL1410500	ROCHELLE	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL1450050	CUTLER	Combined Radium (-226 and -228)	MCL	Under Enforcement
IL1450150	PINCKNEYVILLE	Interim Enhanced Surfsce Water Treatment Rule	TT	Returned to Compliance
IL1570450	RED BUD	Lead and Copper Rule	TT	Under Enforcement
IL1570600	SPARTA	Total Haloacetic Acids (HAA5)	MCL	Under Enforcement
IL1610300	HAMPTON	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance

PWS ID	Community Water System Name	Contaminant Name	Violation Category	Comment
IL1614260	COAL VALLEY	Nitrite	MCL	Returned to Compliance
IL1770250	GERMAN VALLEY	Barium	MCL	Returned to Compliance
IL1795780	NORTH TAZEWELL PWD	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL1795780	NORTH TAZEWELL PWD	TTHM	MCL	Returned to Compliance
IL1815550	SHAWNEE VALLEY PWD	TTHM	MCL	Under Enforcement
IL1975105	CRISWELL COURT MHP	Revised Total Coliform Rule	MCL	Returned to Compliance
IL2034450	GOODFIELD	Total Haloacetic Acids (HAA5)	MCL	Returned to Compliance
IL2035300	OAK RIDGE SANITARY DISTRICT	Lead and Copper Rule	TT	Returned to Compliance

Appendix D
Community Public Water Supply Facilities
Activated Between October 1, 2003 and December 31, 2016

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL0015500	IL VETERANS HOME (QUINCY)	A	4/12/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0070060	GREENVIEW ESTATES MHP	A	9/8//2014	status change - system was active (exempt) prior to 10/1/1999	0
IL0070200	POPLAR GROVE WELL 7 SERVICE AREA	P	1/24/2006	(no permit info available)	
IL0070350	POPLAR GROVE WEST-COUNTRYSIDE	A	10/1/2004	status change - system was active (exempt) prior to 10/1/1999	0
IL0170010	CASS RURAL WATER DISTRICT	A	5/1/2008	8/12/2004	0
IL0170080	ARENZVILLE RURAL WATER COOPERATIVE	A	3/2/2011	2/16/2007	0
IL0195350	ILUR PORTFOLIOS - CARRIAGE ESTATES LLC	A	1/1/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0195360	ILUR WOODS EDGE MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0195370	ILUR PORTFOLIO 5 - WILSON MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0195380	ILUR PORTFOLIO 5 - TRAILSIDE MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0195390	ILUR PORTFOLIO 5- SURBANA ESTATES MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0195400	ILUR LIBERTY COMMONS MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0210030	SHARPSBURG AND NEIGHBORING AREA WATER SY	A	4/13/2011	6/23/2011	0
IL0270040	GATEWAY REGIONAL WATER COMPANY	A	5/10/2007	5/11/2004	0
IL0310200	WOODS OF SOUTH BARRINGTON	A	7/26/2007	7/29/2005	0

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL0310230	MID-MARK WATER COMMISSION	A	1/13/2011	Discovered System-system was active prior to 10/1/1999	0
IL0310370	LINDENTREE TOWNHOMES	A	12/1/2005	10/24/2003	0
IL0311540	LA GRANGE ESTATES MHP	A	7/6/2006	Discovered System-system was active prior to 10/1/1999	0
IL0311900	OAK LANE MHC	A	02/02/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0312050	AQUA ILLINOIS-SUMMERDALE	A	11/19/2015	status change - system was active (exempt) prior to 10/1/1999	0
IL0312433	LARAMIE PARK HOMEOWNER ASSOCIATION	P	10/1/2004	status change - system was active (exempt) prior to 10/1/1999	
IL0312540	GREENBRIAR OF PROSPECT HEIGHTS	P	8/19/2015		
IL0312800	WEATHERSTONE LAKES MHP - SAUK TRAIL, LLC	A	11/22/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0315617	EDWARD HINES JR V A HOSPITAL	A	5/17/2007	status change - system was active (exempt) prior to 10/1/1999	0
IL0315850	STERLING ESTATES MHP	A	7/1/2005	status change - system was active (exempt) prior to 10/1/1999	0
IL0350100	JEWETT	A	12/1/2003	status change - system was active (exempt) prior to 10/1/1999	0
IL0374860	SANDWICH ESTATES MHP	A	8/3/2011	status change - system was active (exempt) prior to 10/1/1999	0
IL0374865	TRIANGLE MANUFACTURED HOME COMMUNITY	A	8/18/2011	Discovered System-system was active prior to 10/1/1999	0
IL0375500	NORTHERN ILLINOIS UNIVERSITY-DEKALB	A	11/24/2004	status change - system was active (exempt) prior to 10/1/1999	0
IL0495400	EASY BREEZE MANUFACTURED HOME PARK	A	5/4/2012	system existed prior to 10/1/1999 but not regulated until 2012	0
IL0510020	KASKASKIA SPRINGS WTER CO.	P	4/21/2009	4/22/2010	

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL0530260	PAXTON MHP LLC	A	12/7/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0570150	BANNER	P	2/10/2014	Permit Denied, No appeal	
IL0578020	BERNADOTTE TOWNSHIP	P	8/5/2009	8/31/2009	
IL0630070	BURT ESTATES MHC	A	2/2/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL0750910	SUGAR CREEK MANUFACTURED HOME COMM., LLC	A	11/15/2006	Discovered System-system was active prior to 10/1/1999	0
IL0810030	MOORES PRAIRIE TOWNSHIP WATER COMPANY	A	5/9/2013	2/23/2012	0
IL0890160	PINGREE GROVE	A	10/6/2005	8/18/2004	0
IL0894400	WILLOW LAKE ESTATES MHP	A	7/1/2015	status change - system was active (exempt) prior to 10/1/1999	0
IL0930300	HIGHGROVE CONSERVATION DEVELOPMENT	P	6/5/2006	5/28/2008	
IL0970330	LONG GROVE SENIOR CARE	P	7/16/2015		
IL0970340	LONG GROVE	P	11/2/2015		
IL0971200	PRAIRIE TRAILS OF LONG GROVE	A	2/18/2004	status change - system was active (exempt) prior to 10/1/1999	0
IL0975040	AQUA ILLINOIS-HAWTHORN WOODS	A	1/1/2005	1/15/2004	0
IL0975070	AQUA ILLINOIS-RAVENNA	A	8/24/2006	7/27/2004	0
IL0975090	SEDGEBROOK INC	P	6/21/2004	status change - system was active (exempt) prior to 10/1/1999	
IL0990560	MENDOTA MOBILE HOME COMMUNITY	A	5/1/2006	Discovered System-system was active prior to 10/1/1999	0
IL0995750	WEST WALNUT TRAILER COURT	A	6/9/2011	status change - system was active (exempt) prior to 10/1/1999	0
IL0995840	SHERIDAN CRCTL CNTR	A	10/15/2003	status change - system was active (exempt) prior to 10/1/1999	0
IL1030350	SAUK VALLEY STUDENT HOUSING	A	9/28/2005	5/10/2005	0

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL1050500	DANA/LONG POINT, READING, ANCONA RWD	I	01/04/2016	8/12/2005	0
IL1050650	IL AMERICAN-SAUNEMIN	A	9/1/2004	status change - system was active (exempt) prior to 10/1/1999	0
IL1090020	SCIOTA	A	11/1/2003	status change - system was active (exempt) prior to 10/1/1999	0
IL1090030	WEST PRAIRIE WATER CO-OP	A	8/22/2007	status change - system was active (exempt) prior to 10/1/1999	0
IL1110070	SPRING GROVE	P	9/23/2005	11/15/2005	
IL1110130	WOODS CREEK WATER SUPPLY	A	11/30/2005	7/22/2003	0
IL1110930	MEADOWS OF WEST BAY WATER TREATMENT	A	10/19/2007	9/15/2005	0
IL1135130	WILLOW CREEK NORTH MHP	A	8/23/2006	Discovered System-system was active prior to 10/1/1999	0
IL1150020	BOODY COMMUNITY WATER COMPANY	A	10/23/2006	8/24/2005	0
IL1170060	SOUTH PALMYRA WATER COMMISSION	A	12/19/2003	status change - system was active (exempt) prior to 10/1/1999	0
IL1195180	OAK GROVE MHP - MADISON COUNTY	A	12/6/2016	formerly exempt - existed prior to 1999 - no SEP required	
IL1235125	AUTUMN RIDGE ESTATES	A	3/29/2007	status change - system was active (exempt) prior to 10/1/1999	0
IL1195160	ENCHANTED VILLAGE	A	6/15/2015	status change - system was active (exempt) prior to 10/1/1999	0
IL1270200	GALLAGHER SUBDIVISION	P	6/19/2012	not active	
IL1375050	NORTH MORGAN WATER COOP	A	11/1/2007	10/14/2005	0
IL1430080	BUFFALO HOLLOW FARMS WATER ASSOC	A	9/7/2004	status change - system was active (exempt) prior to 10/1/1999	0
IL1590200	OLNEY	A	4/3/2008	status change - system was active (exempt) prior to 10/1/1999	0
IL1610350	MISSISSIPPI MANUFACTURED HOME COMMUNITY	A	5/29/2014	status change - system was active (exempt) prior to 10/1/1999	0

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL1615540	TENNANTS SHADY OAKS SUBDIVISION	A	10/1/2012	system existed prior to 10/1/1999 but not regulated until 2012	0
IL1630070	CONCORDIA WATER COOPERATIVE	P	12/20/2011	2/3/2012	0
IL1670060	OAKWOOD ESTATES	A	8/20/2014	status change - system was active (exempt) prior to 10/1/1999	0
IL1670080	SOUTH SANGAMON WATER COMMISSION	A	5/10/2012	12/23/2010	0
IL1670090	ROUND PRAIRIE WATER COOP	A	10/8/2013	7/28/2011	0
IL1670100	WOODSIDE MHC	A	1/22/2013	status change - system was active (exempt) prior to 10/1/1999	0
IL1670110	PARK RIDGE MHC	A	1/22/2013	status change - system was active (exempt) prior to 10/1/1999	0
IL1670120	BISSELL VILLAGE MHC	A	2/11/2013	1/11/2013	0
IL1670130	NORTHBROOK MHC	A	2/11/2013	1/11/2013	0
IL1670140	EDGEWOOD MOBILE HOME COURT (MHC)	A	6/28/2013	status change - system was active (exempt) prior to 10/1/1999	0
IL1670160	RIDGE VILLAGE MHP	A	9/24/2013	status change - system was active (exempt) prior to 10/1/1999	0
IL1670170	MILTON MANOR MHP	A	4/30/2014	status change - system was active (exempt) prior to 10/1/1999	0
IL1670180	LINDEN MANOR MHP	A	4/30/2014	status change - system was active (exempt) prior to 10/1/1999	0
IL1670190	WESTWOOD	A	10/10/2014	status change - system was active (exempt) prior to 10/1/1999	0
IL1670210	WESTWOOD PLACE	A	10/10/2014	status change - system was active (exempt) prior to 10/1/1999	0
IL1670220	GASLITE COURT MHC	A	9/17/2015	status change - system was active (exempt) prior to 10/1/1999	0
IL1670240	DEERWOOD ESTATES	A	9/29/2016	formerly exempt - existed prior to 1999 - no SEP required	0
IL1690020	DHS RUSHVILLE TREATMENT AND DETENTION	A	8/31/2009	status change - system was active (exempt) prior to 10/1/1999	0

Facility Number	Facility Name	Status A=Active P=Proposed	Status Date	Capacity Demonstration Notes/ Approval Date	ETT Score
IL1710020	SCOTT COUNTY RURAL WATER CO-OP	A	7/24/2008	6/10/2002	0
IL1975225	IMPERIAL MHC	A	2/2/2016	formerly exempt - existed prior to 1999 - no SEP required	0

Appendix E
Non-Transient Non-Community Water Supplies
Activated between January 1, 2004 and December 31, 2015

Facility #	Facility Name	Facility Status A=Active I=Inactive	Activation Date	ETT Score
IL3147652	Cornerstone Christian Academy	A	2-24-04	31
IL3147660	Springhaven Park	I	3-1-04	
IL3147728	American Precision Electronics	A	3-10-04	2
IL3147801	All State West Plaza	A	3-25-04	
IL3147900	Barbara Rose Elementary School	A	6-10-04	
IL3148270	Ag View FS Inc.	A	10-14-05	11
IL3148361	Will County Forest Preserve Op & Maint.	I	10-18-04	
IL3148430	Rankin School Dist	A	9-7-04	
IL3148619	North Boone High School (09-27-04)	A	1-4-05	
IL3148742	Barrington Methodist Church	A	3-29-05	
IL3149005	TOYAL AMERICA	A	3-15-05	
IL3149039	Monsanto Agronomy Center	A	6-6-05	
IL3149088	QTC Development, Inc	A	6-7-05	
IL3149252	Countryside Private School	A	10-3-05	1
IL3149427	Mobil Truck Stop	A	10-4-05	
IL3149443	Wilton Federated Church	A – Changed to Transient System	10-4-05	
IL3149559	Citgo Refinery North Well	A	8-2-06	
IL3149591	Plainfield Township	A – Changed to Transient System	1-23-06	
IL3149807	Flower Garden Toddler Center	I	2-1-06	
IL3149849	Walco Tool and Engineering	A – Changed to Transient System	2-15-06	
IL3150052	Toolamation	A	4-21-06	
IL3150102	Forming America Ltd.	A	4-25-06	
IL3150169	Merichkas	A	5-11-06	
IL3150433	Crest Foods Production	A	11-2-06	
IL3150441	Crest Foods Warehouse	A	11-2-06	
IL3150548	Monsanto Seeds	A	11-2-06	
IL3150581	Victory Christian Center	A-Changed to Transient System	1-24-07	
IL3150748	Seward Screw Products 16377	A	3-7-07	
IL3150763	Illinois Crime Lab	I	3-7-07	
IL3139337	Superior Felt	I	8-13-07	
IL3151654	Monsanto Corn Research	A	1-9-08	
IL3151670	Pioneer Hi-Bred Intl. Corn Research	A	3-4-08	
IL3151944	Freemont Intermediate School	A	4-2-08	
IL3152173	Sav A Pet	A	5-14-08	
IL3152223	Apachi Day Camp	A-Changed to Transient System	5-1-08	
IL3152462	Danisco	A	10-1-08	
IL3152504	Monsanto Office	A	10-1-08	
IL3152629	Patriot Renewable Fuels	A	12-17-08	
IL3152645	Monsanto Barn	A	5-8-08	
IL3152744	Mary Sears Child Care	I	11-13-14	

Facility #	Facility Name	Facility Status A=Active I=Inactive	Activation Date	ETT Score
IL3152835	West Hills Shopping Center	A	9-18-08	
IL3152850	Deans Food Company	A	12-29-08	
IL3153015	Chemtool Rockton	A	3-12-09	
IL3153023	Pentecostal Center	I	12-17-08	
IL3153064	Menards	A	2-3-09	
IL3153072	Jewel Wells Spring Grove	A	3-31-09	
IL3153080	Pioneer Hi-bred Int.	A	3-31-09	
IL3153213	Little Bit Country Preschool	A – Changed to Transient System	6-25-09	
IL3153239	ROSENBERG CAR DEALERSHIP	A	3-30-15	1
IL3153288	Cross Roads Community Church	A	6-25-09	2
IL3153346	Scott Company Hyponex	A	6-25-09	
IL3153411	Vermilion Power Station	I	9-17-09	
IL3153569	Rovanco Piping System Inc.	A	9-25-09	
IL3153890	Curry Ice & Coal	I	12-30-09	
IL3153924	Hanson Pressure Pipe West Well	I	6-3-09	
IL3154047	Full Fill Industries	A	2-16-10	
IL3154153	CORNERSTONE EARLY LEARNING	I	1-25-10	
IL3154161	HELMAR LUTHERAN CHURCH	A – Changed to Transient System	3-20-12	
IL3154476	Open Bible Church	I	3-30-10	
IL3154724	Lifes Little Miracles	A	4-13-10	
IL3154567	Moore Tires Inc.	A	4-26-10	
IL3154633	Lutheran General Hospital	A	6-24-10	
IL3154666	Monroe Center School 2 nd Well	A	6-24-10	
IL3155028	MASJID AL HUDA SCHOOL	A	10-20-10	13
IL3155085	We Care Daycare	A	1-3-11	14
IL3147736	Flower Garden Day Care 3 rd Bulilding	A	2-9-11	
IL3148429	MONTESORI ACADEMY GLEN ELLYN	A	2-10-11	
IL3151365	Children of Promise	A	2-10-10	2
IL3155382	SEPTRAN INC	A	2-24-11	
IL3155168	SAUBER MFG CO 11 BAY	I	3-15-11	
IL3155150	SAUBER MFG CO SUPER SHOP	A	3-15-11	
IL3155390	PEACEFUL PATHWAYS	A	4-3-11	
IL3155416	FOX METRO WATER RECLAMATION DISTRICT	A	4-19-11	
IL3155358	SUNSET FOODS VILLAGE OF LONG GROVE	A	5-17-11	
IL3155291	FORBO ADHESIVES	A	5-26-11	
IL3155309	NORTHSHORE UNIVERSITY HEALTH SYSTEM	A	6-28-11	
IL3155606	UIC MEDICAL CENTER CHICAGO	A	8-31-11	
IL3155614	HEARTLAND PRIVATE SCHOOL	A	9-21-11	
IL3155747	NORTHFIELD BLOCK COMPANY 1	A	9-29-11	
IL3155754	NORTHFIELD BLOCK COMPANY 2	A	9-29-11	

Facility #	Facility Name	Facility Status A=Active I=Inactive	Activation Date	ETT Score
IL3155762	NORTHFIELD BLOCK COMPANY 3	A	09-29-11	
IL3155796	AMERICAN AD BAG	A	10-12-11	
IL3155804	MARION JOY REHAB HOSPITAL	A	01-10-12	6
IL3155952	CHRIST COMMUNITY CHURCH	A	01-10-12	
IL3155986	KOLB-LENA CHEESE COMPANY	A	01-10-12	
IL3156323	TRINITY COMMONS	A – Changed to Transient System	04-02-12	
IL3156471	PCS PHOSPHATE	A	06-26-12	1
IL3156554	QUENTIN ROAD BIBLE BAPTIST SCHOOL	A	07-17-12	
IL3156646	WONDERS OF CHILDREN DAYCARE	A	08-02-12	
IL3156695	NACHUSA LUTHERAN HOME	A	09-13-12	
IL3156737	ILLINOIS MARINE TOWING INC	A	09-13-12	1
IL3156760	PRECISION PLANTING	A	09-17-12	
IL3156836	JW MARRIOTT HOTEL	A	11-12-12	
IL3156943	COUNTRYSIDE CENTER HANDICAPPED	A	12-31-12	
IL3156950	WHOLE FOODS MARKET WELL	A	12-31-12	
IL3157149	JX PETERBUILT	A	04-02-13	
IL3157164	AUX SABLE MORRIS	A	04-02-13	
IL3157289	RIVER TERRACE CHURCH	A	05-13-13	
IL3157297	BERNER FOOD & BEV	A	05-15-13	2
IL3157347	PREMIER FABRICATION	A	06-04-13	
IL3157412	RINKS HOLDING LLC	A	07-15-13	
IL3157479	TUGRANT DIVERSIFIED BRANDS	A	09-24-13	
IL3157487	NORTHSHORE UNIVERSITY GLENVIEW	A	10-2-13	
IL3157586	TECHNISAND WEDRON	A	10-9-13	
IL3157594	WEDRON SILCA 2	A	10-9-13	
IL3157636	MYCOGEN SEEDS GRAND RIDGE	A	10-10-13	
IL3157677	NUSSBAUM TRANSPORTATION	A	10-24-13	
IL3157990	AZZ GALVANIZING	A	12-05-13	
IL3157933	PEARL VALLEY EGGS	A	12-26-13	12
IL3157974	CITY OF ROCHELLE AIRPORT	A	12-26-13	
IL3158444	CANTIGNY PARK	A	9-3-14	
IL3158519	NATURE SCHOLARS DAYCARE	A	9-30-14	
IL3158600	INTEGRYS GAS 2 ND WELL	A	10-8-14	
IL3158717	ALLOY SPECIALTIES INC	A	12-26-14	
IL3158774	MACLEAN FOGG	A	1-15-15	
IL3158873	WEDRON SILICA SCREENING HOUSE	A	2-17-15	
IL3158881	WEDRON SILICA MINE SITE	A	2-17-15	
IL3158923	KSI CONVEYORS INC	A	3-4-15	
IL3158774	MACLEAN FOGG M1	A	01/15/2015	
IL3158873	WEDRON SILICA SCREEN HOUSE	A	2-17-15	
IL3158881	WEDRON SILICA MINE SITE	A	2-17-15	
IL3158923	KSI CONVEYORS INC	A	3-3-15	
IL3158956	J M HUBER WELL 1	A	4-9-15	6

Facility #	Facility Name	Facility Status A=Active I=Inactive	Activation Date	ETT Score
IL3159053	FAITH CHRISTIAN ELEM SCHOOL	A	4-9-15	6
IL3159061	CELANESE	A –Changed to Transient	4-9-15	
IL3159418	PRIMROSE SCHOOL/DAYCARE	A	6-17-15	
IL3159459	J M HUBER WELL 2	A	6-30-15	6
IL3159582	DURA BAR METAL SERVICES	A	8-25-15	
IL3159780	Winnebago Co. Rock 59	A	1-14-16	
IL3159806	SWENSON SPREADER LLC	A	1-14-16	
IL3159889	ARNTZEN CORPORATION	A	2-18-16	

Appendix F
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Zhang, Y., W.R. Kelly, S.V. Panno, and W.-T. Liu, 2014. Tracing fecal pollution sources in karst groundwater by *Bacteroidales* genetic biomarkers, bacterial indicators, and environmental variables. *Science of The Total Environment* 490:1082–1090. DOI: 10.1016/j.scitotenv.2014.05.086.

Appendix H:

Rules	Illinois Implementation Status	U.S. EPA Primacy Revision Application or Program Update		U.S. EPA Status Explanation	U.S. EPA Timelines and Milestones
		Status	Date		
Phase II/V Contaminants	Implemented	Approved	9/12/1994		
Total Coliform	Implemented	Approved	6/7/1993		
Lead and Copper	Implemented	Approved	9/12/1994		
New PWS Definition	Implemented	Approved	7/29/2013		
Administrative Penalty Authority	Implemented	Approved	8/1/1998		
Consumer Confidence Report	Implemented	Extension	9/1/2007	R5 primacy backlog	R5 will add the date we received this application.
Operator Certification Program	Implemented	Approved	2/1/2001		
Interim Enhanced Surface Water Treatment	Implemented	Received	1/15/2009	R5 primacy backlog	Working to approve in FY17.
Stage 1 Disinfection Byproducts	Implemented	Received	1/15/2009	R5 primacy backlog	
Lead and Copper Minor Revisions Rule	Implemented	Received	1/15/2009	R5 primacy backlog	
Public Notice	Implemented	Received	9/28/2010	R5 primacy backlog	
Radionuclides	Implemented	Adopted	10/1/2001	R5 primacy backlog	Working to approve in FY17. R5 will add the date we received this application.
Arsenic	Implemented	Approved	7/29/2013		
Filter Backwash	Implemented	Received	1/15/2009	R5 primacy backlog	
Long Term 1 Enhanced Surface Water Treatment	Implemented	Received	1/15/2009	R5 primacy backlog	
Variance and Exemption	Implemented	Extension	9/1/2007	R5 primacy backlog	R5 will add the date we received this application.
Stage 2 Disinfection Byproducts	Implemented	Approved	3/16/2012		
Long Term 2 Enhanced Surface Water Treatment	Implemented	Approved	3/16/2012		

Ground Water Rule	Implemented	Approved	7/29/2013		
Lead and Copper Rule Short Term Revisions	Implemented	Received	10/13/2010	R5 primacy backlog	Working to approve in FY17.
Revised Total Coliform	CWS Implemented, Non-CWS Partial Implementation	Received	3/20/2014	Working to resolve issues regarding NCWS implementation in order to have an approvable package.	Working to approve in FY17/18.