



Illinois
Environmental
Protection Agency

Environmental Policy
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**FY 2001 PERFORMANCE
PARTNERSHIP AGREEMENT
BETWEEN
ILLINOIS EPA AND Region 5, USEPA**

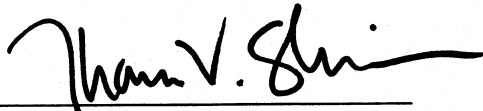
We are pleased to execute our sixth Performance Partnership Agreement and thereby to continue the journey envisioned in the new National Environmental Performance Partnership System (see Figure 1). This agreement sets forth our mutual agenda for continued environmental progress and our expectations for the state/federal relationship. We have assembled in one comprehensive document the joint priorities, goals, strategies and measures for most of the environmental programs that are operated in Illinois. Illinois will also operate under a performance partnership grant that provides federal funding for the programs described in this agreement.

The execution of this agreement demonstrates our continuing commitment to environmental improvement that is cost-effective and responsive to public concerns. We believe that this agreement measures up to the call for finding better ways of doing our regulatory business. It also builds upon the lessons learned from previous partnership agreements.

The seven sections which follow form the body of this agreement and will serve as our joint performance plan for the specified programs.

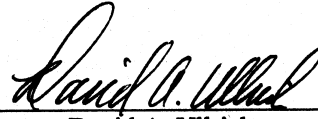
Entered into on this 30th day of January, 2001.

For the Illinois EPA:



**Thomas V. Skinner
Director**

For Region 5, USEPA:



**David A. Ullrich
Acting Regional Administrator**

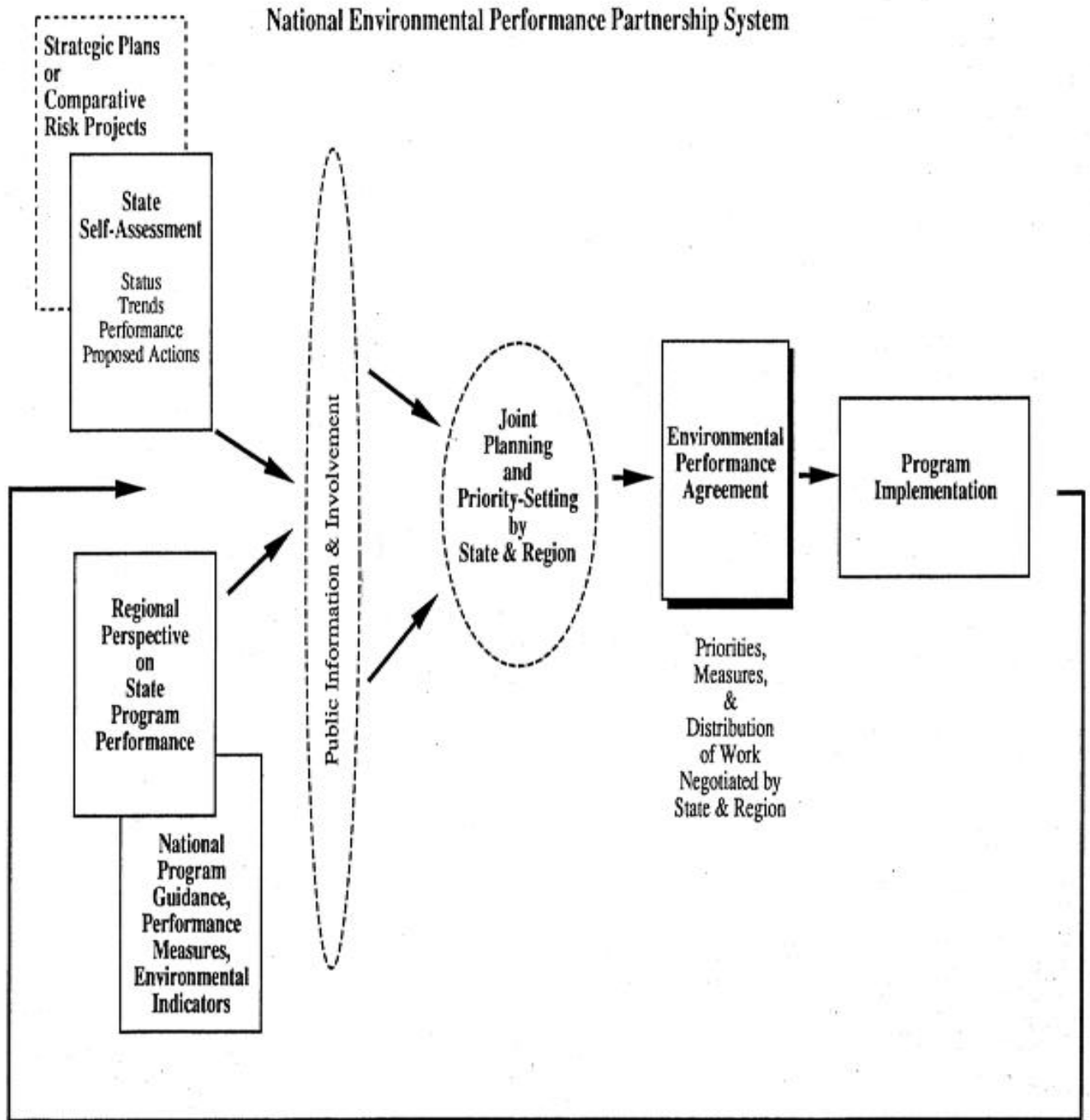
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Listing of Funding Sources covered by PPG
Summary Report for FY 2001 PPA Focus Group Discussions
Listing of Program MOAs/MOUs
Reporting Requirements Inventory
Dispute Resolution Process
Program Outputs

Figure 1



I. GENERAL PURPOSE AND CONTEXT

The purpose of this FY2001 Performance Partnership Agreement ("the agreement") is to set forth the mutual understandings reached regarding the state/federal relationship, the desirable environmental outcomes, the performance expectations for the participating programs, and the oversight arrangements between the parties. The parties to this agreement are the Illinois Environmental Protection Agency (IEPA) and Region 5 of the United States Environmental Protection Agency (USEPA).

A. State/Federal Environmental Partnership

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

B. Strategic Planning Context

Senior leadership from the IEPA and Region 5 held a planning session on September 18, 2000. The discussion focused, in particular, on regional and joint priorities and flexibility pilots. Action items were also identified and confirmed in a letter dated October 5, 2000 from the Deputy Regional Administrator to the Deputy Director at IEPA.

As part of a Governor's initiative, IEPA, along with 19 other agencies in Illinois, developed a new Strategic Plan. This plan addresses the following seven strategic issues that IEPA identified during the planning process:

1. Clean Air
2. Clean Water
3. Safe Water
4. Safe Waste Management
5. Land Restoration
6. Innovative Protection
7. Toxic Chemical Safety

Extensive outreach was undertaken involving focus group discussions in five metropolitan areas around the state. The plan was submitted to the Governor's office for final review in early November, 2000. This review process is expected to be finished about the end of the year. Thus, IEPA's final plan will be available for consultation with Region 5 during the next PPA cycle. However, we have elected to make some structural and content changes in the sixth agreement to reflect what's been done in our plan.

C. Mission Statements and Roles

1. Illinois EPA - Agency Vision and Mission Statements

We have the following vision for the future:

Illinois air, water, and land resources will be:

- *Clean and safe.*
- *Valuable assets in a sustainable economy.*
- *Contributing to an enhanced quality of life.*

The people of Illinois will:

- *Value a quality environment and understand how their actions affect it.*
- *Take an active role in helping to protect and improve air, water, and land resources.*
- *View the Agency as a respected and responsive environmental leader.*

The Illinois EPA will be widely recognized as a public agency that:

- *Makes sound decisions which protect human health and the environment.*
- *Emphasizes continuous improvement, measurable results, quality public service and efficient use of resources.*
- *Shows initiative and fosters new ideas and solutions for better environmental protection.*
- *Listens to external perspectives and works with a wide range of interests to solve environmental problems.*
- *Pursues environmental compliance through both enforcement and assistance activities.*
- *Values employee growth and development by fostering a learning environment and recognizing employee contributions.*

We at Illinois EPA believe in the following core values:

1. Fairness and integrity
2. Open and effective communication
3. Creative thinking and problem-solving
4. Meaningful external participation and involvement
5. Sound environmental decision-making
6. Responsive public service
7. Accountability for results
8. Recognition of employee contributions

We have developed the following mission statement:

THE MISSION OF THE ILLINOIS EPA IS TO PROTECT, RESTORE, AND ENHANCE THE QUALITY OF AIR, LAND AND WATER RESOURCES TO BENEFIT CURRENT AND FUTURE GENERATIONS.

IEPA operates under the auspices of the Illinois Environmental Protection Act and several other state statutes. Under state law, the IEPA is designated as the primary operations agency for purposes of the major federal environmental protection programs. Statutory authority is granted for policy and regulatory development, planning and monitoring, permitting, inspections and enforcement, remedial actions, emergency management, and environmental infrastructure assistance.

IEPA has sought and received delegation of the major national environmental protection programs. IEPA also operates numerous state programs that do not involve a relationship with USEPA. In combination, these national and state-specific program responsibilities place IEPA in the lead role for delivering day-to-day environmental protection in Illinois. This agreement is designed to address the full range of these operations with only a few exceptions.

Illinois EPA recognizes that it has a continuing responsibility to advise Region 5, USEPA regarding statutory or regulatory changes that could have a material effect on an authorized or delegated national environmental program. Region 5, USEPA, in turn, has a responsibility to promptly inform IEPA if it believes such change is inconsistent with applicable federal statutes or regulations governing the affected environmental program. Region 5, USEPA may also identify federal guidance or policies that should be considered in evaluating such change. IEPA and Region 5 agree to work together to resolve the issues related to several Illinois statutory provisions which may create impediments to certain authorization, delegation, or approval of certain federal environmental programs in Illinois, including the audit privilege law, the amnesty provisions in 415.531 (c)(3), Section 31 of the Illinois Environmental Protection Act, and proportionate share liability at 415 ILCS 5/58.9.

Under federal programs that are delegated to the State, IEPA will continue to assume the lead in enforcement and compliance in Illinois. IEPA recognizes that there are also circumstances where USEPA may take the lead in enforcement and compliance as set forth in the Enforcement and Compliance Assurance subsection under Federal Roles. Both agencies recognize the need for timely and open communications to identify and coordinate responsibilities, work activities and opportunities for joint actions in the compliance and enforcement area. IEPA and USEPA are committed to improving work coordination and communications to ensure effective and efficient use of resources. Program offices will continue to coordinate activities with USEPA to ensure the appropriate instances of noncompliance are referred for enforcement actions. IEPA will also identify and evaluate existing enforcement response plans, updating them as necessary to ensure timely and appropriate enforcement can be conducted.

IEPA operates within a complex network of intergovernmental and public/private relationships. The principal roles that IEPA plays within this web of relationships are as follows:

- a. Primary regulator - IEPA has direct regulatory responsibility for the full spectrum of environmental protection matters. This predominant role drives much of our focus and performance. Under the NEPPS, IEPA will strive to improve the environmental protection system in Illinois so that affordable environmental progress can continue to be realized.
 - b. Secondary regulator - IEPA has authority to delegate certain regulatory activities to local governments and has done so under several programs. Certain efficiencies are gained when some regulatory actions take place at the local level. For the most part, these arrangements have worked well and have resulted in a net improvement in program operations. Where feasible, the IEPA will continue to seek out these opportunities and assume a secondary role as needed to ensure the integrity of program performance.
 - c. Environmental information generator - IEPA creates a large amount of information about environmental quality in Illinois and about things that affect Illinois' environment. Under the NEPPS, we want to do a better job of sharing this information with the public and regulated community. The use of environmental goals and indicators should help us move in this direction.
 - d. Policy and technical advice - The IEPA is frequently called upon to give environmental policy and technical advice to a wide variety of interests. This environmental expertise represents a major asset that can be utilized to support our environmental aims.
 - e. Financial provider - The IEPA provides financial assistance to eligible parties in a number of ways via grants, loans and cost-sharing for projects. These valuable resources need to be used wisely so that intended environmental benefits are realized.
 - f. Project sponsor - IEPA assumes direct sponsorship for a wide variety of environmental improvement projects such as hazardous site remediation, tire dump cleanups, collection of household hazardous wastes and safe disposal of abandoned hazardous materials. These environmental services help prevent or correct a wide range of adverse environmental conditions. IEPA is committed to delivering these services in a productive manner.
 - g. Change agent and promoter - The IEPA has opportunities to display environmental leadership and pursue system changes where it makes sense to do so. We want to encourage innovation and to take full advantage of these important opportunities. In exercising such leadership, we become advocates and promoters of new ways of thinking and new approaches for addressing environmental problems. Fostering this outlook within the IEPA is critical if we are to cope with the changing world scene.
2. **Region 5, USEPA** - The federal government has a fundamental responsibility to protect the integrity of the nation's environment and health of its diverse citizenry. Both USEPA and individual states conduct environmental protection activities, with USEPA directly implementing some federal programs, taking enforcement actions against violators, delegating federal programs for state operation, and reviewing and evaluating state program performance. Because pollution does not respect political boundaries, USEPA has a fiscal and statutory responsibility to ensure that a consistent, level playing field exists across the nation. USEPA performs this vital function by providing leadership

when addressing environmental problems that cross state, regional and national borders and ensuring a consistent level of environmental protection for all citizens. The Agency fulfills these responsibilities by working with its many partners--other federal agencies, states, tribes and local communities--to address high priority environmental problems. By offering training and technical assistance, sharing work and conducting scientific and policy research, USEPA helps build the capacity of states and other partners to ensure protection of public health and the environment. USEPA also carries out an important role in reviewing state program performance, incorporating a wide variety of activities, from annual meetings with state program managers to file reviews. Region 5 will continue to provide the state with funding for base programs and specific projects which will achieve environmental results consistent with USEPA and IEPA priorities set forth in this agreement and will evaluate state programs to ensure the fiscal integrity of the USEPA/State relationship. Region 5 will continue to build state capacity for undelegated programs with a goal of moving those programs to the states in the near future.

Federal Role in Enforcement and Compliance Assistance - Compliance and enforcement activities to be accomplished during the term of this Agreement are included in the media programs. However, USEPA and IEPA believe it is helpful to highlight the federal role in compliance and enforcement in this Agreement.

There is a continuing role for USEPA in environmental protection in Illinois. USEPA can assist IEPA in conducting inspections, conducting joint enforcement actions, and in providing compliance and technical assistance to the State and its regulated entities. USEPA carries out its responsibilities in the enforcement arena in a variety of ways. The Agency acts as an environmental steward, ensuring that national standards for the protection of human health and environment are implemented, monitored and enforced consistently in all states. Under this PPA, USEPA and IEPA retain their authorities and responsibilities to conduct enforcement and compliance assistance, and such enforcement will be accomplished in the spirit of cooperation and trust. Additionally, both Agencies agree to explore the most effective application of the full spectrum of compliance tools, including compliance assistance and enforcement, to encourage and maintain compliance of sources.

Specific federal enforcement and compliance assistance responsibilities may include:

- Work on national priorities (e.g., multi-media inspections, companies with significant company-wide non-compliance in several states, and OECA Priority Sectors).
- Work on regional priorities, including enforcement and compliance assistance in Region 5's Principal Places, as well as using this approach to reduce toxics, especially mercury; to promote sustainable urban environments and brownfields redevelopment; to clean up sediments; to protect and restore critical ecosystems; and to protect people at risk, especially children and environmental justice communities.

- Ensuring timely and appropriate enforcement, if necessary, in state and federal programs.
- Ensuring a level playing field and national consistency across state boundaries.
- Addressing interstate and international pollution (watersheds, air sheds, or other geographic units).
- Addressing criminal violations under federal law.
- Multi-media inspections and enforcement at federal facilities.
- Enforcement in non-delegated, partially delegated or non-delegable programs.
- Enforcement to assure compliance with federal consent decrees, consent agreements, federal interagency agreements, judgments and orders.

Both IEPA and USEPA agree in FY 2001 to ensure that there is a productive use of limited federal and state resources to secure compliance. In order to foster improved communications and coordination in the enforcement area, the following approach will be utilized:

Planning and Information Sharing

- IEPA and USEPA will hold an annual planning meeting to discuss enforcement and compliance matters.
- USEPA and IEPA will share information regularly about pending and potential enforcement cases in order to avoid surprises, ensure consistency, minimize duplication and ensure timely coordination of activities. For those enforcement programs where the authorizing statute does not provide for delegation to the states (e.g., non-delegable programs such as TSCA), USEPA will share enforcement information with IEPA to the extent allowed under existing Office of Enforcement and Compliance Assurance policies and procedures. USEPA will also provide IEPA with a copy of each non-delegable program enforcement action issued within the State. Information which is enforcement-confidential will be protected from disclosure by all parties to the fullest extent of the law.

Coordination of Activities

- Each agency will identify cases in which inconsistency with national enforcement response policies or state environmental compliance strategies or duplication of resources are potential problems, or in which coordination between USEPA and IEPA is essential.
- These cases will be discussed at meetings or conference calls, held at least quarterly. Each agency will designate appropriate contacts to attend meetings and discuss identified cases.
- For each facility identified, USEPA and IEPA will discuss and attempt to agree on the appropriate response for the violation and the appropriate agency to take the lead role. For some cases, joint actions may be preferable.

USEPA will take enforcement actions in Illinois as necessary and appropriate to ensure implementation of federal programs and as a deterrent to non-compliance, in accordance with the communication and coordination activities outlined above. There may be emergency situations or criminal matters that require USEPA to take immediate action (e.g., seeking a temporary restraining order); in those circumstances, USEPA will consult with the State as quickly as possible following initiation of the action.

For both USEPA and IEPA, enforcement and compliance assistance is conducted through individual media programs. However, both agencies conduct multi-media enforcement and compliance activities which will require coordination. While individual program activities will be coordinated on a program-specific basis, multi-media activities will be coordinated, when appropriate, through Region 5's Office of Enforcement and Compliance Assurance (OECA) and the Compliance Management Panel. Specific multi-media activities that IEPA and USEPA will work together on in FY 2001 include coordination on multi-media inspections, including consideration of facilities appropriate for multi-media inspections in the Greater Chicago Initiative area, participation in the Greater Chicago Senior Enforcement Managers meetings, and identification of additional joint multi-media activities during the next annual planning meeting.

Region 5 Priorities in Federal FY 2001 - USEPA's Strategic Plan sets the course for the Agency in the coming years and defines the standards against which progress will be judged. To more effectively focus on our mission, 10 strategic, long-term goals are defined which express the desired outcomes: clean air, water, and land; safe food, homes, and workplaces; global environmentalism, sound science, greater compliance with environmental laws; and management integrity and access to environmental information for all Americans. All regional work can be linked to one or more of these goals. To guide our efforts, the Region's *Regional Results Plan* outlines programmatic and Region-specific focus areas for FY 2001. A regional focus area is one that addresses a multi-media environmental problem, needs non-traditional methods to solve the problem, needs federal leadership, is broad in scope, impacts a significant population or resource, and/or is an Administration priority. Each of the Region's five environmental priorities continues to be a joint priority with Illinois; therefore, description of region and state activities for these programs will be found in the next section. For those priorities not identified as joint, however, the agencies will continue to work together to coordinate actions, reduce duplication and manage overlap and complimentary activities.

Region 5 FY 2001 Environmental Priorities are:

- Reducing toxics, especially mercury
- Promoting sustainable urban environments and redeveloping brownfields
- Cleaning up sediments - this is a joint priority found under Protecting and Restoring Critical Ecosystems
- Protecting and restoring critical ecosystems
- Protecting people at risk, especially children and environmental justice communities

To direct limited resources to places where these priorities can be most effectively addressed, the Region has identified **principal places** where the complex environmental problems would most benefit from a multi-media focus. Of the Region's eight principal places, those which impact Illinois are:

- Lake Michigan
- Greater Chicago
- Gateway (East St. Louis, IL)

To implement its activities in the priority places, Region 5 has created multi-media Regional Teams whose role is to evaluate, plan and implement activities to address the site-specific community issues and environmental problems in communication and cooperation with all impacted stakeholders, including IEPA. IEPA has recently identified specific State contacts to facilitate better communication and joint planning in each focus area. State activities supporting the Team goals are described here, under the appropriate State program area or in the Joint Environmental Priorities section as appropriate. Summaries of the Regional Team plans are provided as follows:

- Lake Michigan - Both the USEPA Great Lakes National Program Office (GLNPO) and the Region 5 Lake Michigan Team contribute to activities which promote the clean-up, restoration and protection of Lake Michigan, with GLNPO focusing at a Great Lakes Basin-wide level. USEPA's Great Lakes Program brings together federal, state, tribal, local, and industry partners in an integrated, ecosystem approach to protect, maintain, and restore the chemical, biological, and physical integrity of the Great Lakes. The Great Lakes 5-Year Strategy, developed jointly by USEPA and its multi-state, multi-Agency partners and built on the foundation of the Great Lakes Water Quality Agreement with Canada and LaMP 2000, provides the agenda for Great Lakes ecosystem management: reducing toxic substances; protecting and restoring important habitats; and protecting human/ecosystem species health. These objectives closely align with Region 5 and IEPA's joint environmental priorities and certain GLNPO activities may be described in those sections as appropriate. The Lake Michigan LaMP 2002 will include a strategy for TMDL development for Lake Michigan.

Highlights of Federal activities not covered elsewhere include:

Monitor Lake ecosystem indicators. GLNPO will report information about Lake Michigan air, water, sediments, and biota through the Lake Michigan Mass Balance Study (LMMB), thus enabling the Agency and its partners through the LaMP process to interpret and to target further pollutant reductions. The joint GLNPO/Canadian atmospheric deposition network (including air monitoring stations on each Great Lake) will provide trend and baseline data to support and target remedial efforts and measure environmental progress under Remedial Action Plans (RAPs) and Lakewide Management Plans (LaMPs). GLNPO, with its Canadian counterparts, will lead efforts to establish appropriate Basin-wide environmental indicators in anticipation of the 2002 biennial State of the Lakes Ecosystem Conference which will bring together

representatives of the public and private sectors to facilitate risk- and science-based decision-making. Lake Michigan Basin indicators will be developed by the LaMP. **Manage and provide public access to Great Lakes data.** USEPA's integrated Great Lakes information system, developed by GLNPO and its state and federal partners, will deliver LMMB, and other, scientifically sound, easily accessible environmental information to decision makers and the public by traditional means and via the Internet. GLNPO will pilot techniques to provide public access to LMMB data via the Internet. **Provide and promote community-based environmental protection, especially in AOCs.** USEPA will work with local communities to address the environmental problems they determine to be of the highest priority.

IEPA will continue to give priority to restoration and long-term protection of Lake Michigan. We will support and participate in activities of Region 5's Lake Michigan Team including development of the Lake Michigan lakewide management plan (LaMP) and participation in the Lake Michigan monitoring coordinating council, a revised 5-year Great Lakes Strategy, the Cook County area PCB/Mercury pollution prevention initiative, the Lake Calumet area wetlands initiative, and the LaMP environmental indicators workgroup. The Agency is also actively pursuing numerous other Great Lakes activities including completion of Waukegan Harbor remediation, ecosystem restoration and ultimately its delisting as an Area of Concern (AOC), and participation in multi-state activities (IJC, Council of Great Lakes Governor's initiatives, the Corps of Engineers Great Lakes Dredging Team, the Great Waters provisions of the Clean Air Act). Of particular interest from the broader Great Lakes wide perspective, the Agency will continue participation in GLNPO's implementation plan for the Binational Toxics Strategy and the LaMP's toxics committee. Some of IEPA's P2 programs help support this effort.

- Greater Chicago Initiative - The Greater Chicago Initiative (GCI) focuses on Cook County, Illinois, particularly on the environmental justice areas of the Southeast and West Sides of the City of Chicago. The purpose of the Initiative is to work with local stakeholders, including Region 5, the State of Illinois, Cook County, the City of Chicago, the Metropolitan Water Reclamation District of Greater Chicago, other Federal, State, and regional agencies, industry, and citizens to coordinate various government and private environmental activities for the purposes of effectiveness and efficiency, particularly in areas that fall outside the purview of the regulatory agencies' base programs.

Three subcommittees have been established to work in the areas of enforcement, brownfields, and natural resources. The enforcement committee periodically holds a Senior Enforcement Managers Meeting that consists of enforcement managers from agencies that have environmental regulatory authority within the Greater Chicago area. At that meeting, individual compliance assurance and enforcement cases are discussed and facilities for multi-media inspections are nominated. The brownfields committee has held a workshop for municipalities, and plans another one. In addition, the feasibility of partnering to develop an eco-industrial park is under discussion. The natural resources committee has established the Lake Calumet Government Working Group. The Working

Group coordinates government natural resource activities in Southeast Chicago. Many of these agencies, including the IEPA and USEPA, participate in the Lake Calumet Ecosystem Partnership, a local partnership of stakeholders that has completed a strategic planning exercise and plans to pursue a land management plan for the Lake Calumet basin, good neighbor dialogues, and the possible creation of an eco-industrial park.

In addition to these standing subcommittees, the Region works with IEPA and others in workgroups that have been established to address odors, the Cumulative Risk Initiative, and the cluster sites. Work on the cluster sites consists of characterizing and evaluating conditions on six adjoining CERCLIS sites located near 122nd Street and Stony Island. The IEPA has dedicated considerable remedial resources to one of these sites, the Paxton Landfill. Work on the Cumulative Risk Initiative includes the participation of the IEPA in the Technical Workgroup, a group that advised the Region on the content of the Hazard Screening Report, and the development of a communication plan. IEPA will continue to participate in the GCI odors workgroup. The purpose of this workgroup is to exchange information about efficient handling and appropriate actions for odor complaints in the GCI area. Region 5 has expressed an interest in and offered to discuss with the MWRDGC the odor control plan that is being developed pursuant to state permit. The Deputy Director at IEPA and the GCI Regional Team manager serve as co-chair of the GCI Steering Committee.

- Gateway (St. Louis/East St. Louis) - A very successful and fruitful partnership has developed over the last few years between the Region 5 Gateway Team and the staff of the IEPA, particularly the Collinsville office, as we work together to achieve the goals in the environmental justice Metro East area of improving the quality of life and protecting the natural resources within that community, as well as improving the community economics. Region 5 and IEPA will continue to work together on a Lead Initiative Project and Workgroup collecting and analyzing existing and new lead data to identify exposure pathways, hot spots and other data needs. IEPA will continue to work with USEPA to identify candidates for inspections/enforcement and provide technical assistance to facilities and communities, as well as continue to support the Gateway Enforcement Workgroup by participating in quarterly conference calls. IEPA's Air Program and Public Affairs Office will continue to support USEPA's effort for community forums on air issues, take part in the Sustainable Growth, Stormwater, EMPACT and Brownfields Showcase Advisory Group meetings and will participate in identifying the extent of contaminated sediments. USEPA and IEPA will work to identify results and implement strategies to address the Metro East's stormwater issues and assist with ecosystem restoration and enhancement of wetlands to alleviate flooding. Both agencies will continue to focus brownfields activities on the Metro East St. Louis area and work toward development of community-based indicators of environmental health. IEPA and USEPA will continue to work on tire collection and sweeps and explore areas that would enhance coordination on groundwater issues. IEPA, specifically the Collinsville office, and USEPA will work together to assist the Confluence Greenway, ad hoc group of community organizations, to assess and redevelop Chouteau Island. Both agencies will continue to work together to provide environmental education

initiatives and establish projects to build community capacity among neighborhood, school and environmental organizations.

IEPA will work with USEPA to provide for special data runs to report Gateway-specific numbers from some of the indicators and performance measures areas already identified within the PPA for the following areas: toxic chemical releases, pollution prevention, ozone nonattainment, hazardous air pollutants, acid rain, shallow groundwater, waste disposal at permitted facilities, open dumping, contaminated lands, waterway conditions, wastewater discharges, finished drinking water and groundwater recharge areas.

Other cross-cutting highlights not found elsewhere:

- Human Resource Investment for Change - Region 5 is committed to providing an environment that fosters recruitment, development and retention of a high quality, diverse workforce.
- Measuring and Managing for Environmental Results - Region 5 is committed to working with States to enhance data quality, collection and exchange, allowing us to rely heavily on environmental data to evaluate conditions, identify existing and emerging problems, set priorities, and make decisions to address the top hazards facing public health and the environment. Examples of this effort with Illinois include:

Quality Assurance and Quality Management Plans - Region 5 has a responsibility to ensure the quality of environmental data collected under all assistance agreements. Through the IEPA's development and implementation of an on-going quality management program (per EPA Order 5360.1 A2 (May 30 2000), the quality of environmental data will be known and appropriate for the intended use. For FY 2001, Region 5 QA staff will continue to work with IEPA to facilitate the quality management plan (QMP), that documents its quality system for all granted programs, for approval. IEPA will finalize the QMP for all granted programs and will submit the final QMP to the Region for review and approval by January 31, 2001. The goal for both organizations is to begin implementation of an approved State QMP during the second quarter of FY 2001. For each subsequent year, revisions or updates to the QMP will be submitted to Region 5 for review and approval during the agreement negotiations. Region 5 will retain sole authority to approve individual QAPPs until such time the State QMP is approved. At such time, the authority to review and approve QAPPs for most granted programs, except Superfund and TSCA-PCB inspections, will be delegated to the State. Since GLNPO's QA requirements differ from Region 5, any projects funded by GLNPO will continue to be addressed separately through that program.

One-Stop Reporting project - IEPA will develop a 120-Day Plan in accordance with the forthcoming grant agreement. The 120-Day Plan will address the One-Stop building blocks in the context of enhancements planned for IEPA's information management and integration systems over the next 3-5 years. IEPA will work with Region 5 to facilitate information sharing about data integration and to jointly work towards the following:

1. Assessment and implementation of national data standards for facility and chemical identification coding;
2. Improvement of electronic communications and links (EMPACT, Envirofacts warehouse);
3. Implementation of data integration beginning with the development of an Agency Compliance and Enforcement System known as ACES. All programs are involved in and committed to this strategic enterprise system, with coordination being provided by an Agency-wide ACES Data Management Coordinating Committee. This approach involves developing a centralized facility (locational) tie file, which all programmatic areas will utilize, as well as shared core databases for compliance, enforcement, and permitting. Individual programmatic systems will be built or updated to either use directly, feed to or extract information from this central framework.

D. Relationship of Agreement to Grants

Illinois EPA will operate under a Performance Partnership Grant (PPG) in FY 2001. The programs that are described under this agreement are coordinated with the program elements used for the PPG. With this approach, we have taken a major step towards a more integrated approach to environmental management in Illinois.

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

The parties also recognize that some specific project grants will continue in effect and operate in concert with this agreement. These special activities are best managed in this coordinated manner to ensure program integrity. The attached listing of grants shows the breakout between the categories of federal funding for FY 2001.

Congress requires USEPA to ensure, to the fullest extent possible, that at least 11 percent of federal funding for prime and subcontracts awarded in support of USEPA programs be made available to businesses or other organizations owned or controlled by socially and economically disadvantaged individuals, including women and historically black colleges and universities, based on an assessment of the availability of qualified minority business enterprises (MBE) and women-owned businesses (WBE) in the relevant market. Region 5 must negotiate a fair share objective with each state for procurement dollars covering supplies, construction, equipment and services. Accordingly, for any grant or cooperative

agreement awarded in support of this agreement, the parties agree to ensure that a fair share objective will be made available to MBEs and WBEs.

E. Joint Planning and Evaluation Process

The parties believe it is important to clearly articulate how all the components of the performance partnership are interrelated and sequenced. We will carry out the following joint planning and evaluation process.

Actions	Milestones
1. Annual Environmental Conditions Report	June
2. State's Self-Assessment	July
3. Planning Dialogue Sessions	August
4. Agreement Negotiations	September
5. Final Performance Partnership Agreement	October
6. State's Performance Report for PPG	November
7. Region's evaluation of State's annual report	January

The Annual Performance Report for the PPG and the Annual Environmental Conditions Report have become the key components for performance review. The State's self-assessment will also serve as a planning basis for the next year's agreement with some emphasis on important performance considerations. It is also expected that national program guidance should be available at about this same time. File reviews or other oversight by Region 5 will be coordinated with this mid-year and annual report cycle.

II. SCOPE OF AGREEMENT

On August 28, 2000, IEPA submitted a Performance Self-Assessment to Region 5 for the following programs:

- | | |
|------------------------------------|-------------------------|
| Clean air | Regulatory innovation |
| Clean land | Pollution prevention |
| Clean/safe water | Environmental education |
| Toxic chemical management | Community relations |
| Environmental emergency management | |

The programs for this year are described in Section VII of the agreement. We have consolidated regulatory innovation, pollution prevention, and environmental education into one program. Community relations has also been merged into the other applicable programs. Two programs (D, E) have been described individually but are all part of a comprehensive program element, Multimedia Programs, for purposes of the PPG.

While USEPA and IEPA have attempted to provide a description of each Agency's environmental protection activities for the period of this agreement, it should be noted that there may be additional activities warranting action that is not contemplated at this time. USEPA and IEPA agree that coordination will occur as appropriate over the course of the agreement period to avoid overlap and duplication of effort in addressing new issues and concerns as they arise.

Furthermore, we recognize that this agreement does not necessarily encompass every agreement between IEPA and USEPA, and that some agreements, relationships, and activities will be described elsewhere. (USEPA also has agreements and responsibilities with other state agencies that are not included in this agreement.) This agreement does not replace or supersede statutes, regulations, or delegation, authorization or program approval agreements entered into with the State.

III. GENERAL PRINCIPLES FOR STATE/FEDERAL RELATIONSHIP

The IEPA and Region 5, USEPA have complementary missions to protect and restore the air, land and water resources. In order to accomplish these missions, the IEPA and Region 5 must maximize their resources and minimize activities that don't contribute to these missions or that hinder their accomplishment. Therefore, in working toward our mutual success, the IEPA and Region 5, USEPA, agree to the following principles:

1. We will work together as partners in a spirit of trust, openness and cooperation and with respect for each other's roles.
2. We will work to ensure that the State, as the major implementer of state and federal environmental protection programs in its jurisdiction, has the greatest degree of flexibility allowable under existing laws and delegation guidelines based on program performance and environmental progress.
3. We will coordinate our work to avoid duplication of effort.
4. We will work to ensure that communication is frequent and timely to avoid surprises; that communication within each agency occurs and that efforts are made to ensure that the right method of communication is used and that information reaches the right person.
5. We will use an agreed upon dispute resolution process (see attachment) to handle the conflicts that are certain to arise as we implement our environmental programs and will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure.
6. We will acknowledge EPA's role in the direct implementation of federal programs and in ensuring that federal programs are carried out in a consistent fashion throughout the region.
7. We will work to ensure that staff at all levels are aware of and held accountable for realizing these agreed upon principles.

IV. ENVIRONMENTAL RESULTS

Under the NEPPS, state and federal program managers are directed to focus more on "improving environmental results." To achieve this focus, the NEPPS calls for setting environmental goals and using environmental indicators to keep better track of our progress. We see this new focus as part of the next generation of environmental protection that is starting to emerge and take shape in various ways.

Both IEPA and Region 5 have some experience working with characterization of environmental conditions. IEPA has historically collected ambient environmental quality data and reported findings in various ways. Under the NEPPS, however, we think that more attention must be paid to developing improved linkages between actual environmental conditions and program performance so that we can better assess our effectiveness over time. It should also help us to apply our resources where they will do the most good.

A. Environmental Goals, Objectives, and Indicators

We have continued to refine the goals, objectives, and indicators to be consistent with the performance measurement hierarchy agreed to between ECOS and EPA. As a result of this effort, we have 7 environmental goals and 14 environmental objectives and indicators. We see these goals and objectives as a useful way to focus more attention on environmental results and to guide program planning. We do not view these goals as specific deliverables that involve accountability for grants purposes. In other words, program success does not hinge solely on attainment of particular goals. Establishment of these environmental targets gives programs a more clear sense of direction and certainly sound performance should show some progress towards the desired outcome. It must be understood, however, that some environmental conditions are influenced by factors beyond the normal control of an environmental program. Thus, actual attainment of a goal may be compromised even though program performance went very well by most measures. Even with such limitations, we believe it has been useful to go through the goal setting process and to work on program linkages.

B. Annual Environmental Conditions Report

In August, 2000, IEPA published the fifth Annual Environmental Conditions Report - 1999. This report presents a full account of our environmental progress for the environmental goals and indicators. From year to year, we expect to gain more understanding regarding the directional influences between the objectives/indicators and the performance of these environmental programs. Eventually, we envision a two-way, inter-active relationship will develop. Performance strategies are designed to achieve progress towards the desired environmental outcomes. In turn, information gathered for the indicators may influence the program directions that are taken.

We continue to encourage public review and comment regarding this report and the progress that is shown.

V. JOINT ENVIRONMENTAL PRIORITIES

This section of the agreement presents our joint environmental priorities and an overview of the highlights for these important matters. More details and explanations can be found in the next section under the program strategies.

A. Reduction of Toxics, Especially Mercury - Releases of toxic substances have caused serious adverse effects in humans and damage to the environment. The laws, regulations, and multiple programs of USEPA and the states traditionally have been devoted in large part to investigating and reducing releases of toxic substances, most often in single-medium contexts. Consequently, Region 5 has created a multi-media Toxic Reduction Team to promote coordination of toxics reduction efforts, while the Toxics Program Section within Region 5's Waste Division has primary responsibility for PCBs, TRI and lead. IEPA has a similar multi-media focus on addressing toxic pollutants. Some areas of initial emphasis are: the reduction of releases of mercury; implementation of the Great Lakes Binational Toxics Strategy; the investigation of endocrine disruptors and toxaphene; and the reduction of lead. The Region 5 Toxic Reduction Team, the Toxics Program Section, and the IEPA will work on areas of common emphasis by providing technical support, sharing information, and by coordinating and disseminating results of scientific research. Particular areas of emphasis include the following:

1. Reduce mercury levels - To meet release and use reduction goals, federal actions for FY 2001 include: outreach to industry, organizations, and citizens on pollution prevention and risks; studying alternative use and treatment/disposal options; clearinghouse support and information; and implementing maximum achievable control technology standards (MACTs), the Great Lakes Water Quality Initiative (GLI), and the Great Lakes Binational Toxics Strategy. For example, USEPA will develop outreach materials aimed at the construction and demolition industry to encourage proper disposal of mercury-containing devices found in buildings. The Binational Toxics Strategy mercury workgroup will explore options to reduce mercury releases from utilities through pollution prevention, energy efficiency, fuel switching, and green marketing programs, and will conduct outreach aimed at reducing the use of mercury-containing household products.

The implementation of a memorandum of understanding with the American Hospital Association, which commits to virtual elimination of mercury from hospital waste by 2005, is another USEPA priority. Training opportunities will be provided to hospital staff and a model waste minimization plan will be developed. In addition, under a grant from USEPA's Great Lakes National Program Office, Illinois EPA and the Illinois Waste Management and Research Center will be conducting training and providing pollution prevention technical assistance to hospitals in the Chicago area during FY 2001. This project will focus on mercury-containing devices and waste streams.

Illinois EPA's Bureau of Land is seeking authorization for the recently adopted Universal Waste Rule (UWR). The UWR is designed to encourage proper recycling of mercury-containing wastes (i.e., batteries, thermostats) by reducing the regulatory requirements for

these wastes. In addition, Illinois EPA is developing a rulemaking petition to be presented to the Illinois Pollution Control Board (IPCB) for the addition of mercury-containing electric lamps (i.e., fluorescent and HID lamps) to the UWR. This effort should further reduce the presence of mercury in Illinois' municipal solid waste and hazardous waste streams.

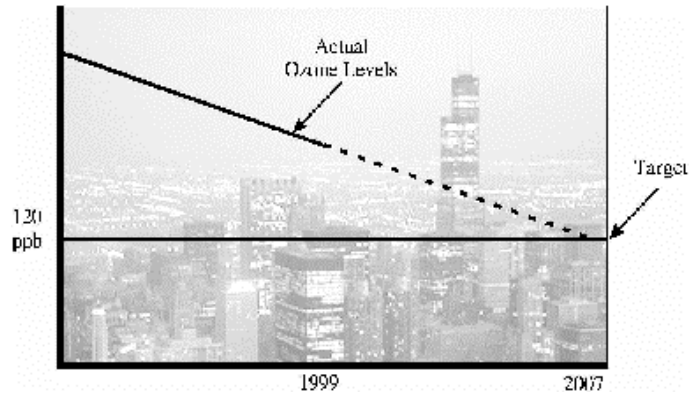
2. Reduce levels of Great Lakes Binational Toxics Strategy (BNS) toxicants - General Region 5 actions for FY 2001 include: monitor and evaluate implementation of the Binational Toxics Strategy and promote toxics reduction activities outlined in BNS. Specific actions include: promote removal of PCBs through PCB corrective actions, the PCB Phasedown Program, Supplemental Environmental Projects, and the BNS; reduce mercury use and releases; assess atmospheric pollutants; continue efforts to identify and quantify emissions of PAHs, B(a)P in particular; and investigate levels and sources of cadmium, 1,4-dichlorobenzene, 3,3'-dichlorobenzidine, dinitropyrene, endrin, heptachlor, hexachlorobutadiene and hexachloro-1,3-butadiene, hexachlorocyclohexane, 4,4'-methylenebis(2-chloroaniline), pentachlorobenzene, pentachlorophenol, tetrachlorobenzene, and tributyl tin.
3. Understand characteristics and effects of endocrine disruptors (ED) - To gauge the seriousness of ED impacts and to develop needed approaches, Region 5 actions for FY 2001 include: tracking and disseminating information; develop investigation and communication strategies; responding to issues and stakeholder inquiries; training through workshops and fact sheets; support effluent analysis for alkylphenols and estrogen at POTWs; support vitellogenin analysis of fish collected in Region 5 rivers and Great Lakes; track development of water quality criteria for developing water quality standards and develop data for issuance of health advisories; provide coordination and clearinghouse support.

Illinois EPA has developed an Endocrine Disruptors Strategy (2/97). Further development work is described in the program strategies for the relevant programs.

4. Reduce lead exposure - Illinois EPA has taken numerous steps to respond to removal of lead-based paint that gets released to the environment. The IEPA investigates these incidents, takes appropriate samples and works with responsible parties to ensure adequate cleanup of these hazardous materials. IEPA is also developing a regulatory approach that would help prevent these adverse impacts due to unsafe removal of lead-based paints.

Region 5 actions for FY 2001 include: promote education and outreach programs on lead exposure through grants; improve regional coordination; support geographic initiative efforts; and implement portions of a Regional lead strategy which could include developing a method for screening lead cluster areas and investigating use of uniform health standards and risk assessment methodology.

B. Addressing Ozone Nonattainment - While there has been significant improvement in ozone levels in the country over the past 25 years, ozone has been and continues to be the most pervasive air pollutant problem in Region 5, including in Illinois. It is the single pollutant for which the State is in non-attainment, and yet it is the pollutant with which the vast majority of the State's population has the most contact. Attaining the ozone standard is a top priority for both the Region and the State. It is clear that the Region and the State must work closely to identify and develop cost-effective programs that result in reductions of ozone precursors in order for the State to attain the standards. Details of the State's strategy for the next fiscal year leading to attainment of the national ozone standards can be found in the Clean Air Program section. Region 5, ARD also has a role in assisting the State in its quest for attainment of the ozone standards, including aid in developing innovative and creative approaches to obtaining emissions reductions, in advocating the approval of such approaches with USEPA Headquarters, and in working together with IEPA to achieve ozone reductions through the Clean Air Counts campaigns.



C. Promoting Sustainable Urban Development - The focus of "Sustainable Urban Environments" is upon the interaction of urban form with the environment. As our urban areas grow, and as they age, the patterns of development and redevelopment have significant effects on the water, air, and land, and on human health and the environment. USEPA and Illinois EPA will work together to seek creative ways to lessen the impact of urban growth patterns on the environment. In particular, the agencies will cooperate in the implementation of the Clean Air Counts campaigns, through quantification of the air quality benefits of the various efforts, and through focused contact with specific local governments, industries, and developers. In addition, during 2001 the Illinois EPA will continue to work with the Metro East Sustainable Growth Resources Group (Group) as they focus on issues related to stormwater and flooding. The Group is rethinking its mission and developing action items within its ability to execute.

"Brownfields" has emerged over the last seven years as one of the most significant issues and opportunities for the Illinois EPA. Illinois EPA has been a national leader in this area and will continue to improve its program efforts to accelerate redevelopment of contaminated sites. This effort will include the implementation of 1) the Brownfields Redevelopment Grant Program and the Environmental Remediation Tax Credit, and 2) the Southeast Chicago hazardous waste cleanup work. Illinois EPA will continue to work jointly with USEPA Region 5 as an active participant in its Brownfields Team activities. Additional information on these joint Brownfield efforts is discussed in Section H(3).

The Illinois EPA, through the Bureau of Land will continue to coordinate with USEPA to help evaluate the nature and extent of contamination and risks to public health and the environment from a cluster of hazardous waste sites located near Lake Calumet on the southeast side of Chicago (Alburn Incinerator, Paxton Landfills, Paxton Lagoons, U.S. Drum, etc.) BOL also will coordinate state remedial and brownfields cleanup projects in the immediate area such as Paxton II Landfill, in accordance with applicable regulatory requirements. The goals are to: 1) achieve consistency with the environmental restoration goals developed by government agencies and local stakeholder groups to protect public health and the environment, 2) promote the development of open space and natural habitat, and 3) improve the infrastructure and drainage in the area.

D. Protecting and Restoring Critical Ecosystems - Ecosystem degradation and loss is one of the most critical environmental management problems facing the United States today. This conclusion is consistent with the international community's Biodiversity Treaty, which identifies the loss of diversity as a global problem. Ecosystems in Region 5 and the Great Lakes Basin, beset by great ecosystem alterations and biodiversity losses, nevertheless sustain globally rare ecosystems, ecological communities, and species. These resources are being lost or degraded by physical impairment, exploitation, global climate change, chemical pollution, and the biological invasion of exotic species.

1. Lake Michigan Basin

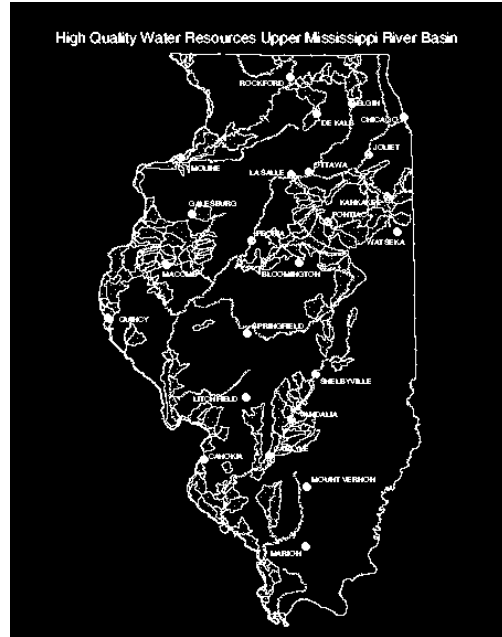
- a. Great Lakes Area of Concern (Waukegan Harbor) - Completion of the Waukegan Harbor remediation is making good progress through citizen and government cooperation. Regular meetings between the Waukegan Harbor Citizens Advisory Group (CAG) and the U.S. Army Corps of Engineers continue to be held to provide citizen input into the dredging plan. The Corps is expected to release its engineering feasibility study and recommended alternative in October 2000.

A Stage 3 Remedial Action Plan for Waukegan Harbor was provided to the International Joint Commission in FY2000.

- b. LaMP/TMDL - The Lake Michigan Lakewide Area Management Plan (LaMP) was released in April 2000 marking a transition from a predominately plan development focus toward more active implementation phase. One of the priority LaMP activities for FY2001 will be the cooperative development of a TMDL strategy for the open lake impairments, with intergovernmental and stakeholder meetings to occur in 2001.
- c. Grand Calumet River - Under a grant from USEPA's Water Division, the U.S. Army Corp of Engineers is implementing a project entitled: Grand Calumet River, IL - Sediment Clean-Up and Remedial Action Plan Feasibility Study. The project will result in a report identifying a range of remediation alternatives addressing contaminated sediments and habitat restoration of the Illinois portion of the Grand Calumet River. IEPA, in cooperation with the Illinois State Water Survey and Illinois State Geological Survey, has been providing direct support of the Corp's remedial

assessment through additional physical and chemical characterization of the sediments within the study area. The Illinois EPA will continue to provide technical support and participation as the Corps of Engineers complete the remediation plan.

2. Upper Mississippi River Basin - The Mississippi River forms the entire western border of the State of Illinois and includes a total of 723 mainstem river miles. With the exception of the Wabash River and direct tributaries to the Ohio River, the Upper Mississippi River Basin encompasses the majority of the State of Illinois, including the Illinois River basin. The Illinois EPA has identified High Quality Water Resources in need of further protection efforts in watersheds within the Upper Mississippi River Basin (see figure). A great deal of attention has been focused on nutrient and sediment loadings of the Mississippi River and its impact on the hypoxia issues in the Gulf of Mexico. This has made the Upper Mississippi River Basin a priority for both USEPA Region 5 and the State of Illinois. In



support of the development of the Upper Mississippi River basin Water Quality Framework, and in cooperation with the Upper Mississippi River Basin Association and the five basin States Illinois EPA and USEPA will work constructively to assure:

- That effective water quality monitoring, assessment, and management efforts on the Upper Mississippi are coordinated among the five Upper Mississippi River Basin States and appropriate federal agencies;
- That this work leads to the development of a strategy and its implementation; and
- That the potential for the Upper Mississippi River Basin Association to facilitate this effort will be assessed by the Upper Mississippi River Basin States jointly, and if agreeable promoted as a priority or funding.
- Illinois Nutrient and Sediment Assessment - A science assessment of hypoxia in the Gulf of Mexico was conducted by the White House Committee on Environment and Natural Resources (CENR) and the six final science reports were completed in May, 1999. The final integrated assessment (CENR, 2000, Integrated Assessment of Hypoxia in the Northern Gulf of Mexico, National Science and Technology Council Committee on Environment and Natural Resources, Washington, D. C.) was published in May 2000. The primary purpose of this investigation was to determine the causes and consequences of a hypoxic condition (depletion of dissolved oxygen) created in the Gulf of Mexico which adversely impacts commercial fisheries. The key finding of the assessment is that hypoxia in the northern Gulf of Mexico is caused

primarily by excess nitrogen delivered from the Mississippi-Atchafalaya River Basin in combination with stratification of Gulf waters. Illinois has been identified as one of the major sources of nutrients and sediments in the upper Mississippi River system. The supporting science reports for the assessment identified the source of nutrients (nitrogen and phosphorus) and looked at methods, costs, benefits and effectiveness of load reduction. In addition to the CENR study, USEPA also provided funding through grants to the Illinois EPA to produce the report entitled Baseline Loadings of Nitrogen, Phosphorous, and Sediment from Illinois Watersheds (printed, February 2000). This report provides details on source of nutrient and sediment loadings from Illinois watersheds which contribute to the Mississippi River Basin.

The Mississippi River/Gulf of Mexico Watershed Nutrient Task Force, at an October 11, 2000, meeting, reached agreement on an Action Plan, based on the Integrated Assessment, to reduce the extent of the hypoxia in the Gulf of Mexico. Federal, and State officials agreed on a \$1-billion-per-year plan to revive as much as 30% of the dead zone by 2015. The recommended plan calls for a 30% reduction in the amount of excess nitrogen reaching the Gulf of Mexico.

A strategy for dealing with the recommendation of the Action Plan, which is expected to be published in January 2001, identifies the establishment of Sub-basin committees and the development of sub-basin strategies as two primary actions for addressing sub-basin (such as the Upper Mississippi and Illinois River) and State issues. Illinois EPA and Region 5 will initiate these recommendations by identifying representatives to a sub-committee for the Illinois River Basin and to begin the development and implementation of a sub-basin strategy.

EPA and Illinois EPA will recommend that the Water Quality Technical Committee of the Upper Mississippi River Basin Association participate in some capacity, possibly as the convener of the sub-basin committee. This effort will be initiated with the Upper Mississippi River Basin Association in 2001.

3. Illinois River Initiatives - Within the State of Illinois, the Illinois River Basin has been identified as a major priority. The Illinois River Watershed is one of the most significant natural resources in Illinois. The watershed includes more than 90 percent of the state's population, consists of approximately 60 percent of the total land area of Illinois, and is a principal corridor for drinking water, recreation and commerce. Protection and enhancement of this natural resource is a priority concern of the state of Illinois. The Illinois EPA has identified numerous sub-watersheds that include rivers, streams, lakes or groundwater resources that represent high quality water resources worthy of protection and actions of a preventative nature to protect these resources. In order to focus public attention and identify resource needs, several initiatives are underway which are worthy of attention:
 - Integrated Management Plan for the Illinois River Watershed - Under the Chairmanship of Lieutenant Governor Corinne Wood, an Illinois River Strategy Team was formed. This group of public and private sector representatives formed an

Illinois River Planning Committee to develop recommendations regarding environmental and economic issues on the Illinois River.

Recommendations under these issues form the heart of the Integrated Management Plan. The January 1997 Plan became the foundation for the next significant initiative, The Illinois River Restoration and Conservation Grant Act.

- Illinois River Restoration and Conservation Grant Act - This Act establishes an interagency body to develop and administer a grant program to fund local watershed management projects. Focus is to be placed on ecological and economic interests, and to stimulate local and private interest in watershed enhancement and protection. The Act established the Illinois River Coordinating Council to advise on grant awards and to make recommendations towards the betterment of the Illinois River. The Council is comprised of representatives from the Governor's Office, the Illinois Congressional Delegation, state natural resource and environmental agencies, and private interests involved with the watershed.

In order to meet some of the challenge facing the Illinois River and its tributaries, a program was developed by the Lt. Governor that relied on existing federal funding sources. "Illinois Rivers 2020" is a voluntary program that incorporates many of the programs and attributes of the Conservation Reserve Enhancement Program (CREP) and other upland nonpoint source pollution control efforts under the Corps of Engineers and USEPA. Congress has recently authorized \$100 million in federal funding for the "Illinois River 2020" program. The federal Fiscal Year 2001 budget appropriates \$1 million for the program.

- Conservation Reserve Enhancement Program - In addition to the above activities, and to initiate the objectives of protection and enhancement of the Illinois River watershed, Illinois has successfully negotiated with the USDA/FSA and Commodity Credit Corporation resulting in Illinois obtaining 100,000 acre Conservation Reserve Program enhancement for the Illinois River watershed. The State Enhancement Program proposed a total acreage of 232,000. Additional acreage eligibility will be based on successful landowner sign-up in the initial program. These additional funds will be used to achieve the goals of reducing soil erosion and sedimentation, improve water quality, and enhance wildlife and fish as detailed in the Lt. Governor's Integrated Management Plan. The estimated total costs for the Conservation Reserve Enhancement Program (CREP) for the Illinois River watershed is \$438,978,000 over 15 years. Illinois will cost share 20 percent, or \$91,733,600. As of June 2000, a total of 41,947 acres had been enrolled in the CREP. Total costs of contracts to landowners was \$70,148,938.

The Illinois EPA is assisting this effort by providing financial support to those counties needing additional assistance to process sign-ups and assist landowners. It is expected that a successful and positive experience in this program will enhance sign-up in other counties having Unified Watershed Assessment Strategy Category 1

waters within their jurisdiction. The Illinois EPA is assisting this effort by providing financial support to those counties needing additional assistance to process sign-ups and assist landowners. It is expected that a successful and positive experience in this program will enhance sign-up in other counties having Unified Watershed Assessment Strategy Category 1 waters within their jurisdiction or waters/watersheds not meeting their designated uses, requiring the preparation of a TMDL.

- USEPA and Illinois EPA Detailed Work Plans - Both agencies will continue to work with local watershed interests in high priority watersheds, as identified in the Unified Watershed Assessment and Watershed Restoration Priorities. This will include providing guidance for preparing watershed plans, and tools for motivating the public to become involved. Progress regarding watershed planning within the Illinois River basin will be reported to the Illinois River Coordinating Council, of which, USEPA is a member. Both agencies will continue to explore ways in which USEPA can provide additional technical assistance.
4. Special Resource Groundwater, and Regulated Recharge Area Projects -The Illinois EPA will continue to review petitions for designating area(s) contributing groundwater to dedicated nature preserves as Class III Special Resource Groundwater. The Illinois State Water Survey is in the process of delineating the contributing area for over 80 dedicated nature preserves. The Nature Preserve Commission intends to submit petitions to the Illinois EPA for Class III review and subsequent designation by the Illinois Pollution Control Board (Board).

The Illinois EPA has proposed the first regulated recharge area regulation to the Board for the Pleasant Valley Public Water District. The Board held a hearing and posted a first notice proposal on August 10, 2000 for public comment. The regulation proposes a recharge area suitability assessment certain prohibitions of new potential sources and establishes performance and operations standards for potential sources storing over 100 pounds of hazardous substances. It is anticipated that the Board will promulgate this regulation in 2001.

5. Chicago Wilderness - USEPA invites Illinois EPA this year to become an active partner in the Chicago Wilderness coalition. Both agencies recognize that they do a significant amount of permitting, enforcement, monitoring and other important environmental protection tasks within the 6-county Chicago region. The Chicago Wilderness coalition consists of 124 state, local, federal, NGO and other partners that are actively implementing a plan to increase the local biodiversity. Many of our activities have a direct relationship with the work of these partners and both agencies this year will pursue means to better recognize the work that we are doing similar to these partners, determine how to record the environmental outcomes in a more relevant and appropriate manner and determine a method to report these outcomes to all relevant audiences. This is truly innovative environmental work and both agencies wish to capitalize on an opportunity to improve environmental outcomes in the Chicago region and then to use that model to improve environmental performances in other parts of the state.

E. Protecting People at Risk, Especially Children and Environmental Justice Communities -

Over the last decade, concern about the impact of environmental pollution on particular population groups has been growing. There is widespread belief that minority or low-income populations bear disproportionately high and adverse human health and environmental effects from pollution. Most recently, in May 1997, in support of the Presidential Executive Order for all Federal agencies to address health and safety risks to children as a high priority, EPA established the Office of Children's Health Protection (OCHP), whose mission is to make protection of children's health a fundamental goal of public health and environmental protection in the U.S. Children are particularly vulnerable to environmental health risks because their systems are still developing, they eat and breathe proportionately more food and air per pound of body weight and typical childhood behaviors, such as playing outside, crawling on the floor or putting things in their mouths, exposes them to different environmental hazards. IEPA and Region 5 are committed to addressing environmental threats to these populations and will facilitate these efforts through periodic conference calls (i.e. quarterly).

Illinois EPA is developing a management strategy (see regulatory innovation program) for "sensitive receptor areas." IEPA is focusing on schools and environmental events (accidental releases, violations/enforcement cases, total toxic chemical releases, etc.) that occur in the vicinity of these sites. Areas of high potential impact will be identified and evaluated for protective measures. In response to the Agency's call for continued emphasis on children's health, Region 5 continues to support a multi-media Team called REACH (Region 5 Environmental Actions for Children's Health). The goal of this team is to ensure that the protection of children's health is a fundamental consideration of all environmental decision-making in Region 5. The Region will continue to focus on practical actions that community groups, parents, medical personnel and others can take to protect children by reducing asthma triggers, exposure to lead based paint, mercury and other contaminant sources of concern to children. The Region will continue the dialogue on children's environmental health between and among governmental, academic, medical, public health and community organizations. Coordinating and building a relationship with and among State agencies that are or should be concerned with children's health is a priority for the region and particularly the Children's Health Team. The Region's evaluation of environmental exposures of concern to children in Region 5 and assessment of available data on diseases with potential environmental contribution are continuing. The REACH team would like to coordinate these efforts with IEPA for potential areas of overlap and joint use.

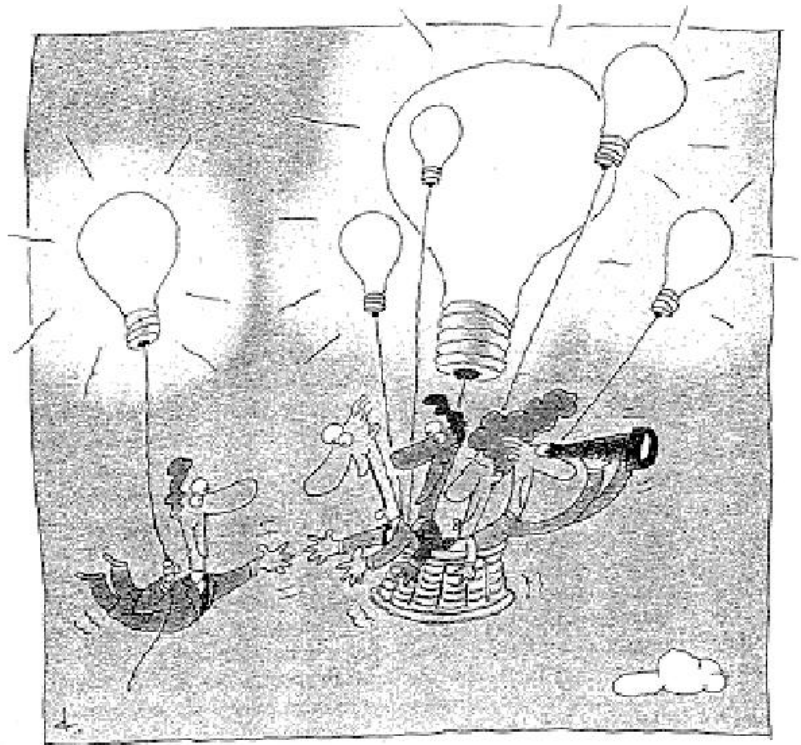
Region 5's environmental justice goal is to "*Ensure that all Region 5 citizens are protected from disproportionate impacts of environmental hazards and have adequate opportunity to participate in environmental process*". With regard to environmental justice, Region 5 will focus on three key areas of emphasis: 1) continue EJ policy development and implementation into regional policies and programs; 2) decrease human health and environmental impacts; and 3) enhance stakeholder outreach and partnerships. Examples of Regional efforts include sponsorship of informational/training forums with community groups, States, business and industry; development of enhanced GIS mapping capabilities; and provision of grant opportunities and grant writing software. USEPA will also continue

to support human health research efforts related to environmental justice and children's programs.

Region 5 will continue to use its June 1998 revised interim EJ guidelines for identifying and addressing potential environmental justice concerns in federal activities, including permit issuance and enforcement reviews. USEPA will implement Title VI of the Civil Rights Act and will consider environmental justice issues through the review of and comments on other federal agencies' proposals and actions under the National environmental Policy Act and Section 309 of the Clean Air Act.

F. Regulatory Innovation - The command and control regulatory approach has dominated environmental protection for more than twenty-five years. While much progress has resulted from this approach, various management and performance concerns have also developed as ever more stringent regulations have been employed. Some states have begun to look into alternative approaches that may be more suitable for future environmental protection programs.

In Illinois, statutory authorization was provided in 1996 to conduct a pilot regulatory innovation program for five years. Under this program, we expect to enter into agreements with progressive companies that want to sponsor projects to try out innovative environmental measures. Further explanation of this program and other innovation work is provided in Section VII.



"True innovation requires an organization that is receptive to new ideas."

TECHNOLOGY REVIEW, 1993

Region 5 will work to develop and provide new approaches to the existing regulatory frameworks which are more efficient and flexible, reward creativity and outstanding performance, and protect more effectively human health and the environment. This will include developing and implementing national initiatives such as XL, Strategic Goal Program for Metal Finishing, and National Performance Track Program, and the processing of the USEPA-ECOS Agreement to pursue regulatory innovation proposals.

VI. PUBLIC INVOLVEMENT

Both the Illinois EPA and the USEPA are publicly accountable government organizations that exist to protect human health and the environment. This agreement is an evolving public document that can inform and guide public debate on environmental problems, goals, priorities, strategies and accomplishments; a document whose development and content over time will be in part shaped by public involvement. The agencies commit to development and use of a mix of approaches to effectively achieve public outreach and involvement.

Public outreach and involvement have several fundamental purposes:

1. Public information - to increase public understanding of the critical environmental issues facing the State.
2. Public education - to share information with the goal of motivating environmentally desirable public behaviors.
3. Public involvement - to engage in dialogue with stakeholders in order to gather their input and feedback systematically, offering an opportunity to shape the content and direction of environmental programs. Stakeholders include the other governmental entities, the regulated community, interest groups, academia, and the general public.
4. Coordination - to engage in cooperative discussion and activities with other providers of environmental protection services (e.g., other state and federal agencies, local governments, public, private, and non-profit groups) to ensure that planning goals, strategies, and implementation measures maximize environmental benefits and minimize duplication, gaps, and inconsistencies.

For FY 2001, Illinois EPA and Region 5 held one focus group session. This session for environmental interests was held on August 28, 2000. IEPA offered to hold a second session for business interests, but these groups decided it was not needed this year. A third session for local government interests was not held due to time constraints and other outreach efforts done for the IEPA's new strategic plan. An attachment presents a summary of the discussions, including IEPA's responses, and lists the participants in the one session. IEPA has also prepared and attached a master list of MOA/MOUs.

VII. PROGRAM PERFORMANCE AND ACCOUNTABILITY

For this agreement, we have continued to refine the goals, objectives and indicators to fit the hierarchy ("SMART" Chart) agreed to by ECOS and EPA. We have included the environmental goals and objectives, and program objectives and outcomes in the main text of the agreement. Program outputs are all listed as an attachment. This approach reflects our desire to emphasize focusing on environmental results.

Illinois EPA and Region 5 continue to evaluate the national environmental data and reporting systems for each major program to identify good candidates for streamlining, wherever possible. This effort is believed to be critical for realizing the full potential of the NEPPS. During FY 98,

a Reporting Requirements Inventory was completed (see attachment). Over time, we expect this master inventory to reflect the outcome of agreed reporting burden reductions or other changes.

Illinois EPA and, when applicable, Region 5 agree to the following multi-program performance deliverables for FY 2001:

- a. Program weaknesses or improvement needs that are identified in annual reports or assessments, in concert with EPA's perspective on environmental conditions and program performance, will be appropriately addressed.
- b. National environmental information and reporting systems will be supported through timely submittal of data that is collected by the State and Region.
- c. Suitable fiscal controls will be operational and adequate financial reporting will be maintained.
- d. Core performance measures will be addressed as shown in the program-specific sections of this agreement.
- e. Performance strategies will be implemented and results achieved will be evaluated in the next annual performance report and self-assessment.

To accommodate what we are still learning about NEPPS, we may need to revise our performance expectations at appropriate times during the year. Both parties are amenable to being responsive to responsible requests for change as the circumstances may dictate.

Flexibility Pilots - Second Round

This agreement places special emphasis on partnership realization by identifying several **flexibility pilots**. These pilots are aimed at improving current operational practices or trying some alternative performance arrangements. For FY 2001, we will conduct the following flexibility pilots:

1. OMP integration with NEPPS - IEPA wants to avoid creating yet another performance system that must be managed. Thus, we are designing a quality management system that will be integrated with key aspects of the annual NEPPS process. For example, we do not want a separate annual work plan for quality management nor do we want to see separate periodic evaluation reports. The performance self-assessment and the annual performance report could handle the results of evaluation efforts. The PPA will serve as the vehicle for describing planned work as agreed to last year. We are continuing this pilot another year to ensure that the preferred approach is put into practice.
2. Targeted Review of Title V Permits Based on Standard Industrial Code SIC - The USEPA would refrain from reviewing our draft/proposed Title V permits for the remaining 51 unissued permits for the sources that took a 15 tps limit to avoid the ERMS that have a SIC code identical to that of the CAAPP permit that has already been reviewed and issued. USEPA would free up time to work on higher priority permits. Success for IEPA's permit program will be obvious in the form of expedited permit issuance.

3. Lake Michigan LaMP/TMDL - The components of the Lakewide Area Management Plan are very similar to the key elements for TMDLs. As one of four states that border Lake Michigan, Illinois cannot independently satisfy TMDL requirements. Effective involvement and coordination from USEPA is necessary to ensure a manageable outcome for both the LaMP and the TMDL processes. An integrated approach has been committed to in the Lake Michigan LaMP 2000 and should be pursued so that the final LaMP addresses eventual development of an approvable TMDL in a timely manner. For FY2001 the Agencies will participate in strategy and stakeholder meetings to develop the action plan.

4. Performance of RCRA Compliance File Audits - During FY 2000, the Bureau of Land (BOL) completed self-audits of the compliance files for 47 RCRA facilities selected by USEPA (Region 5). Seventeen files were audited in December, 1999 and 30 files were audited in June, 2000. Region 5 chose the facility files to be audited primarily through a review of RCRIS (now RCRAInfo) data. BOL staff reviewed the files and submitted file review summaries to Region 5. The June, 2000 compliance file audit required approximately one month's worth of full-time work to complete due to the large number of facilities involved with extensive compliance/enforcement histories. A letter from Bill Child (IEPA) to Bob Springer (Region 5) dated November 21, 2000 outlines a new approach to conducting compliance file audits in Illinois. The Bureau of Land believes strongly that this new approach will represent the most efficient and productive method for conducting compliance file audits. In addition, it will help ensure the consistent application of the Hazardous Waste Civil Enforcement Response Policy (ERP) between the IEPA and USEPA Region 5. In the future, BOL will request that Region 5 limit the requested number of files to be audited to approximately 20 files. This represents a more manageable number of files to be audited considering the resources involved and IEPA's excellent record in past compliance file audits. BOL has also suggested a mid-December, 2000 initial compliance audit meeting with Region 5 enforcement staff.

MEDIA PROGRAMS

A. Clean Air Program

1. **Program Description** - The Bureau of Air is organized, functionally, around five priority program areas:

- **Ozone** - Two major metropolitan areas in Illinois are part of interstate areas that continue to be out of compliance with the 1-hour ozone standard. There has been significant program development in terms of regulations to reduce precursors in our efforts to comply with this standard, particularly since the Clean Air Act was amended in 1990. In FY99, we focused on development of a state implementation plan (SIP) for nitrogen oxides (NOx) as part of our response to the transport SIP call issued by the U.S. Environmental Protection Agency in the fall of 1998. Additionally, we completed our analysis of Illinois' attainment status under the 8-hour ozone standard and submitted air quality data late in FY99. We recommended designations under the 8-hour standard in FY00. However, the D.C. Circuit Court's opinions in *American Trucking Associations, Inc. v. USEPA* (175 F.3d 1027 (D.C. Cir. 1999)), which stayed enforcement of the 8-hour standard and remanded it back to USEPA for development of criteria for setting the standard at 0.08 ppm, and *Michigan v. EPA* (No. 98-1497, D.C. Cir. May 25, 1999), which stayed submittal of the SIPs in response to the NOx SIP call, called into question the status of the SIP call and the 8-hour standard. Therefore, in early FY00, we turned our attention to identifying alternative approaches to demonstrating attainment in Metro-East and Chicago. We submitted a draft attainment demonstration for Metro-East in November 1999 and final documents, except for rules to implement the necessary reductions, in February 2000. On March 3, 2000, the court issued its opinion generally upholding the NOx SIP call (*Michigan v. EPA*, 213 F.3d 663 (D.C. Cir. 2000)). At that point, we again turned our attention to completion of development of the rules necessary to implement the national NOx trading program offered by USEPA in the NOx SIP call. On June 29, 2000, we submitted draft rules for electrical generating units (EGUs) as the rule to implement the attainment demonstration for Metro-East, even though the EGU rule for the SIP call is more stringent than that necessary to meet the minimum requirements of the attainment demonstration. In FY01, we will complete the promulgation of the rule for EGUs, allowing for their participation in the national NOx trading program, and the rules for non-EGUs and cement kilns. We will develop and propose a rule for large, stationary internal combustion engines following USEPA's promulgation of a federal rule consistent with the court's remand of USEPA's findings for that sector. Additionally, we will track USEPA's actions regarding 8-hour ozone designations. The ozone program includes all activities relative to ozone, from monitoring to rulemaking to participation in subregional assessments of ozone to operation of the enhanced vehicle emissions testing program to voluntary measures through the Partners for Clean Air Program and the Clean Air Counts Campaigns.
- **Title V Program Implementation** - This element of the Clean Air program includes the significant permitting activities required by the Clean Air Act. The primary focus in

FY01 is to continue to improve our rate of issuance as well as to participate in and tracking the development by USEPA of revisions to the New Source Review Program, amendments to Part 70, and other related actions prior to seeking amendments to the state program. Additionally, we will pursue the legislative amendments to Section 39.5 of the Illinois Environmental Protection Act (415 ILCS 5/39.5) necessary for full approval of our Title V program.

- Air Toxics - Emissions of toxic air pollutants has been a concern of both the Illinois and the U.S. Environmental Protection Agencies for many years. Illinois has been active in the development of maximum available control technology (MACT) standards for a number of years. This year we will continue our focus on various programs that are evaluating levels of air toxics and identifying means of reducing such emissions. We will also continue our participation in various Regional and national activities, including the Cumulative Risk Initiative and development of national rules and guidance pertaining to area sources and residual risk.
 - Compliance - Activities traditionally associated separately with field inspections and enforcement all come under the larger umbrella of compliance. The Bureau will proceed with its routine inspections and other compliance activities as well as participating in specific state and federal initiatives, including implementation of MACT standards as they are promulgated.
 - Base Programs and National/Regional Priorities - Although the four program areas listed above are very focused priorities, the base programs must continue to function so as to maintain the progress we have achieved thus far both in the area of ozone reductions and with regard to other pollutants, such as sulfur dioxide (SO₂) and particulate matter (PM₁₀). Such base programs include air monitoring, state permitting, and data management, among others. Although many of the activities implementing the Agency's pollution prevention and small business programs are carried out by Field Operations Section inspectors and Permits Section analysts, coordination of these programs within the Bureau of Air is included in Base Programs. At the same time, there are key national and regional initiatives that should be included in our priorities, such as deployment of speciation monitoring network to assess fine particulate matter (PM_{2.5}).
2. Program Linkage to Environmental Goal/Objectives - Trends in air quality gauge the success of the air pollution control program. These trends are determined from a combination of air quality measurements and emission estimates. The planned program objectives and program activities of the air program contained in this agreement will contribute in a variety of ways to the improvements reflected in those trends. For example, the declining trend in air quality exceedances and the steadily improving air quality conditions measured through the Air Quality Index provide an indication of the quality of the pollution control regulations and the effectiveness of the compliance assurance program. Emission trends illustrate the direct relationship between the control program and reductions of the targeted pollutants in the atmosphere. A summary of our environmental goals, environmental objectives, and the measures that demonstrate progress towards these goals and objectives is as follows:

Environmental Goal

Illinois should be free of air pollutants at levels that cause significant risk of cancer or respiratory or other health problems. The air should be clearer (i.e., less smog), and the impact of airborne pollutants on the quality of water and on plant life should be reduced.

<i>Environmental Objectives</i>	<i>Environmental Indicators</i>
<p><u>General Air Quality:</u></p> <ol style="list-style-type: none"> 1. Maintenance of 95%¹ "good" or "moderate" air quality conditions in the areas of the state outside the Lake Michigan and Metro-East 1-hour ozone nonattainment areas. 2. Maintenance of 95% "good" or "moderate" air quality conditions in the two 1-hour ozone nonattainment areas. 3. Maintenance of attainment status for pollutants other than ozone, especially in urban areas. <p><u>Ozone:</u></p> <ol style="list-style-type: none"> 4. Attainment of the 1-hour ozone standard by 2007. 	<p>Air Quality Index levels outside the 1-hour ozone nonattainment areas.</p> <p>Air Quality Index levels in the 1-hour ozone nonattainment areas.</p> <p>Trends in monitored levels of each criteria pollutant other than ozone.</p> <p>Trends in the relationship between the number of days in exceedance of the 1-hour ozone standard in the nonattainment areas and the number of days conducive to the formation of ozone.</p>

¹The new Air Quality Index, which replaces the Pollutant Standards Index, includes the 8-hour ozone standard. It also includes six categories of air quality: good, moderate, unhealthy for sensitive groups, unhealthy, very unhealthy, and hazardous.

<i>Program Objectives</i>	<i>Program Outcome/Measures</i>
1. VOM emissions in the Chicago nonattainment area reduced by at least an additional 68 tons per day by 2002.	Seasonal VOM emissions in the Chicago area 1-hour ozone nonattainment area by sector.
2. NOx emissions outside the Chicago nonattainment area reduced by at least an additional 105 tons per day by 2002.	Seasonal NOx emissions outside the Chicago 1-hour ozone nonattainment area by sector.
3. Reductions in emissions of hazardous air pollutants.	Trends in hazardous air pollutants as reported through the National Toxics Inventory.
4. Minimize the number of days of high priority violation.	Average number of days for significant violators to return to compliance or to enter into enforceable compliance plans or agreements.

3. Performance Strategies - Performance strategies include the daily activities performed by the Bureau of Air that ensure that our environmental goal and program objectives and outcomes are being met. The performance strategies are described below as program activities. Attaining the ozone standard is a priority with the IEPA, and the planning activities related to it have been identified as an area of program activities. The program activities performed in the other four priority areas described below also support the progress we have made towards attainment of the ozone standard as well as support for maintenance of the other criteria pollutants. For example, a source's permit includes conditions that limit the source's emissions of ozone precursors as well as other pollutants so that the source's emissions do not cause or contribute to exceedance of any pollutant standard.

a. Ozone - The 1-hour ozone standard is the only one of the six criteria pollutants for which the State of Illinois is not in attainment. Therefore, attaining the national standard is a priority for us, and it deserves attention separate from the other, more functional programs in the Bureau of Air.

- General - IEPA will continue and expand upon our previous progress towards obtaining voluntary episodic emission reductions through the Partners for Clean Air, including measurement of program support, assessment of SIP credit potential, and continuation of our public education efforts. Additionally, we will participate in ozone forecasting and mapping projects.
- 1-Hour Ozone - IEPA will complete its rulemaking establishing limitations on NOx emissions from EGUs and submit the rules to USEPA as part of the attainment demonstrations for the Metro-East and Chicago nonattainment areas. IEPA will also complete the modeling necessary for the 1-hour attainment demonstration for Chicago. IEPA will complete the rulemakings for non-EGUs and cement kilns in

- response to the NO_x SIP call, including requesting parallel processing for these rules before the court-established SIP submittal date of October 28, 2000. IEPA will submit the triennial ozone precursor inventory to USEPA. IEPA will also continue participation in the Campaign for Clean Air and Development between communities in northeastern Illinois and USEPA in an effort to find creative means of obtaining reductions of VOM and NO_x to further enhance air quality in the area.
- 8-Hour Ozone - IEPA will track USEPA's final designations of the 8-hour ozone standard.
 - Mobile Source Programs - IEPA will continue implementation of the Clean Fuel Fleet Program and will track transportation planning and conformity by MPOs and IDOT. Additionally, as part of a state initiative, we will implement the Illinois Alternative Fuels Act. IEPA will continue implementation of the enhanced vehicle inspection and maintenance program in the nonattainment areas.
- b. Title V Program Implementation - IEPA will continue to improve its rate of issuance of Clean Air Act Permit Program (CAAPP - Illinois' Title V program) permits to ensure that sources in the State are aware of their obligations to enable them to comply, including working with Region 5 to provide it draft/proposed permits for federal review concurrent with public notice and review. Improving our rate of issuance of CAAPP permits is a necessary and important element of our air program that enables Illinois to meet its environmental and program objectives of attaining the ozone standard and maintaining attainment with other NAAQS. The Bureau of Air and Region 5 ARD will jointly determine and address any required revisions to the Title V program resulting from adoption of USEPA's final amendments to 40 CFR Part 70 and any permitting issues. We will issue construction permits with PSD and New Source Review evaluations as appropriate. The Bureau will improve its rate of input into the RACT/BACT Clearinghouse.
- c. Air Toxics - The Bureau of Air's air toxics program is very active on the national level in the development of MACTs, on the state/regional level through our participation in the mercury initiative and the Great Lakes project, and on the state level in the development of data relative to pollutants other than HAPs that Illinois has identified as being of concern in this state.
- MACT Development - We will continue our very active participation in development of MACT standards during FY01, including participation in the development of NESHAPs for the miscellaneous organic NESHAP, iron and steel foundries, site remediation, metal can coating, and miscellaneous metal parts products coating, among numerous others.
 - § 112 Implementation - IEPA will continue implementation of § 112 major HAPs requirements consistent with the Delegation Agreement between Illinois and USEPA, including subsections (g)(New Source Review), (f)(residual risk), (i)(early reductions), (j)(site-specific MACT where USEPA has not promulgated categorical

MACT), and (r)(risk management plans). Moreover, IEPA will work with Region 5 in implementation of § 112(k) through the various community-based initiatives identified below.

- Monitoring - Illinois will continue operation of two urban air toxics monitoring sites at Northbrook and in southeast Chicago through December 2000, including collection of air quality data and submission of that data to AIRS on the same schedule as PAMS data is submitted. IEPA will operate four PAMS monitoring sites on the required schedule.
- O'Hare Airport Project - IEPA will operate a monitoring program at O'Hare Airport through December 2000 to compare ambient toxics levels in the vicinity of O'Hare with other parts of the Chicago urban area and will submit the data collected to AIRS. Region 5 will participate in this program by reviewing the data collected with IEPA.
- Urban Toxics Strategy - Illinois will work with USEPA within the framework of the Integrated Urban Air Toxics Strategy, including evaluation of the impact of the strategy on Illinois source sectors, evaluation of federal/state roles, and determination of the significance of sectors not affected by MACT standards.
- Community-Based Toxics Assessment - We will track development and evaluate the National Air Toxics Assessment (NATA), including coming to an understanding of USEPA's methodology. Further, IEPA commits to working with Region 5 and sources or groups of sources towards gaining reductions of toxic emissions or further risk assessment, largely through the Cumulative Risk Initiative.
- Great Lakes Project - Illinois will continue its work on air toxics inventory enhancement in conjunction with the Great Lakes Project. Additionally, assuming approval of our proposal, Illinois will join with Ohio in the deployment of state-of-the-art mercury monitoring. Illinois will collaborate with Region 5 and the other Great Lakes states to develop a long-range regional plan to address air deposition.
- Mercury Initiative - Illinois will continue its work with other Region 5 states regarding determination of the uses of mercury and how to address reduction of its use and in Region 5's Binational Toxics Strategy Mercury Workgroup to reduce releases of mercury in the Great Lakes Basin. Additionally, deployment of the state-of-the-art mercury monitors identified above will provide more specific information regarding mercury deposition.
- Inventory - We will continue to work with Region 5 to refine Illinois' air toxics inventory as part of NATA including the quality assurance and completion of the 1999 inventory of 188 HAPS in NET format and development of 1999 database modeling parameters.

- d. Compliance - All compliance matters, including field inspections and enforcement, are addressed under this category.
- Inspections - The Bureau of Air will implement the FY01 compliance workplan. We will participate in Regional enforcement initiatives with respect to prioritizing inspections and follow-up enforcement and compliance assurance and with respect to hospital and infectious waste incinerators, municipal waste incinerators, and ethanol plants, as provided below under Compliance.
 - Compliance - The Compliance Unit in the Compliance and Air Systems Management Section of the Bureau of Air will facilitate compliance and enforcement initiatives, including the following National/Regional initiatives: coal-fired utilities; refineries; MACT degreasers, chrome platers, and printing/publishing sources; HON sources; chemical sector sources; mini-mills; federal facilities; NSR/PSD/FESOP/Title V sources; stack testing in geographic priority areas; portland cement plants; ozone sources; mega-animal feeding facilities; municipal waste and hospital waste incinerators; and ethanol plants. The date stack testing was completed, the results of the test, and the type of enforcement action taken will be entered into AFS for sources found in violation of emission limitations. IEPA will work towards providing stack test information for all sources that test during FY01. Additionally, the Compliance Unit will track compliance with the ERMS, including trades. Illinois EPA will develop a process for the annual systems performance review as provided in the ERMS rules.
- e. Base Programs and National/Regional Priorities - The base programs are those areas of the air program that continue every day to assure clean air in the State. This element of the air program includes, for example, air monitoring and our work in the area of particulate matter. National/regional priorities are those specific areas of air pollution control that USEPA or Region 5 has identified as deserving of particular attention.
- Air Monitoring - The Bureau of Air will compile a complete and valid air quality database sufficient to meet program needs and USEPA's requirements. We will operate the air monitoring network pursuant to USEPA's guidelines. Additionally, we will continue to obtain data from the PM2.5 monitoring system and will deploy the remaining five chemical speciation sites as federal funding allows. It is important that federal funding pursuant to § 103 be continued and be timely. We will work with Region 5 to conduct audits on CEMS.
 - State Permitting - The Bureau of Air will issue construction and "lifetime" operating permits to state (non-Title V/non-FESOP) sources and providing proposed construction permits to Region 5 as appropriate.
 - PM2.5 - Through multi-state workshops coordinated by LADCO, Illinois and the other LADCO states' staffs have begun developing the process to expand the state inventories to include emissions of PM2.5 and PM2.5 precursors.

- Vehicle Programs - The Bureau of Air will implement its Clean Fuel Fleets Program and will continue its programs addressing vapor recovery (Stage I, Stage II, and Tank Truck Certification). We will also continue operation of the State program established pursuant to the Illinois Alternative Fuels Act, which is to encourage the use of alternative fuels in the State, partially through encouraging establishment of a refueling infrastructure.
- Data Management - Data management is a program important to the Bureau of Air's ability to efficiently handle the vast amounts of data generated through permitting, inspections, inventory development, air quality planning, monitoring, and so forth. It is an element of our program that supports our efforts to attain the ozone standard and to maintain attainment with the other NAAQS.
 - ERMS Database Implementation - The Bureau of Air will continue to evaluate its performance.
 - Annual Emissions Reporting - The Bureau of Air will revise Annual Emission Report rules to encompass special ERMS reporting of HAPs, as well as other changes in reporting requirements since it was last amended.
 - Integrated Comprehensive Environmental Data Management System (ICEMAN) - We will complete an evaluation of the ICEMAN system and prepare an updated Conceptual Design with plans for future modifications and enhancements.
 - Agency Compliance and Enforcement System (ACES) - In cooperation with other parts of Illinois EPA, we will complete the General Design and begin the implementation of ACES. This is an expansion of the Bureau of Air's plan to develop an Air Compliance Module for ICEMAN. ACES will interconnect with ICEMAN and integrate the Bureau of Air's compliance and enforcement needs with those of the rest of the Illinois EPA.
- Community Relations - The Bureau of Air is committed to involving the public (citizens, community leaders, and company representatives) in various Bureau activities. The Bureau of Air, through the Office of Community Relations, disseminates information and promotes public involvement in various Bureau programs through a variety of outreach mechanisms, including public meetings and hearings, workshops and conferences, fact sheets and pamphlets, news releases, and responsiveness summaries. Community Relations is engaged in an ongoing process to maintain a dialogue with individuals and groups to ease public concern, raise public awareness, and increase public trust.
- Multimedia Agency Programs - The Bureau of Air will continue its active participation in the Agency's public education program, including measures to educate the public regarding measures individuals can take to help reduce pollution. The Agency's Pollution Prevention Program is implemented in the Bureau of Air principally through Permits and Field Operations Sections; these Sections will enhance their assistance to ERMS sources and will assist the medical community in developing waste management plans. Pollution prevention assistance will continue to be a routine part of inspections performed by Bureau of Air inspectors. Inspectors and permit analysts will assist small businesses in their awareness and understanding

of existing and proposed MACT standards and air pollution regulations. As described above under Air Toxics, we will continue our participation in the Great Lakes Project. We will also proceed with a regulatory approach to limiting particulate emissions of lead from, principally, sandblasting activities, part of another Agency initiative. Bureau of Air will support the Agency's Regulation Innovation Program through the Permits Section.

- National/Regional Priorities - As described above, we will continue active participation in the development of MACT standards. Also as described above, we will participate with Region 5 in performing audits of CEMS, particularly those for SO₂. Region 5 will help the state in its participation on a national level in the development of ozone policies and will work with the Agency to streamline Title V. The Bureau of Air will participate in the Chicago Compliance Initiative, the Campaign for Clean Air and Development, and the Clean Air Counts Pilot.

4. Clean Air Program Resources

Federal Resources	51 FTE
State Resources	<u>352</u> FTE
TOTAL	403 FTE

- 5. Federal Role** - The Region 5 Air and Radiation Division (ARD) commits to support the Bureau of Air in all efforts necessary to achieve the agency's mission of Clean Air. A priority will be playing a leadership role in the identification and resolution of program issues at the national level which impact state implementation. Region 5 will work with Illinois to assess issues of concern and develop possible solutions. Region 5 will facilitate issue resolution through the HQ process to ensure answers are timely and responsive to state concerns, while reflecting appropriate national consistency. Specifically with regard to SIPs, Region 5 will provide technical assistance, review, and testimony where requested, before and during state rulemaking. Completeness reviews will be completed within 60 days, but no later than 6 months from the date of submittal, and Region 5 will prepare Federal Register actions as expeditiously as possible, while striving to achieve statutory deadlines for rulemaking actions. Administratively, ARD will continue to provide Illinois EPA timely information regarding available resources and competitive grants throughout the year and will work with the State to expeditiously apply for and receive appropriate awards.

ARD will work with Illinois EPA to seek innovative ways to address broad regional priorities, including community based environmental protection, pollution prevention, and compliance assistance. Geographic initiatives are in place in the Greater Chicago and East St. Louis areas in Illinois, and efforts will continue to foster relationships with these local areas and address specific community concerns related to air pollution. Greater Chicago Team activities for FY01 which relate to air programs include the continued participation in the interagency (Illinois EPA, Cook County Department of Environmental Control, and the Chicago Department of Environment) odors workgroup, continued asthma outreach and

education, especially networking with local organizations such as the Chicago Health Corps to develop more effective communication tools, and promoting assessment of transportation and sustainable development activities. For example, Region 5 will be participating on the Clean Air Counts pilot project, which, among other things, will assess the impacts of New Source Review (NSR) construction permit regulations on infill development. ARD will also provide continued support to the Cumulative Risk Initiative (CRI), the result of the TSCA Petition submitted to Headquarters regarding cumulative risk issues and incinerators. The Region plans to finalize and release this study during FY01. Completion of the loading profile phase is expected early in FY01, with data being made available to the State, local agencies and the communities and the industries indicated by the assessment as principle contributors of toxic emissions in the study area. We envision multiple opportunities to use this information to assess and target opportunities to reduce current emissions, as well as to apply information and analysis in the report to better understand and implement our MACT, inventory, and monitoring activities. We expect to work with Illinois EPA to brainstorm and prioritize such efforts. The Region has put in place a grant with the Delta Institute to identify facilities that may be emitting high hazard pollutants for pollution prevention and ISO 14000 activities. This project will commence as soon as the study is finalized. Air-related priorities in the Gateway area include the creation of action plans to develop sustainable urban development and its related benefits. This is accomplished by pulling together stakeholders including communities, businesses, and environmental groups to meet in workshops and discuss how to maximize economic and environmental benefits to their city. Region 5 will also participate in the Clean Air Counts Pilot which is designed to explore NSR effects on redevelopment, air quality benefits of infill development, and research of clean utility siting in urban areas.

Region 5 has been actively involved in the Campaign for Clean Air and Development in the Chicago area, with a diverse network of stakeholders to create new strategies for attaining Clean Air Act standards while achieving redevelopment goals. These strategies will influence municipal and private actions such as Brownfield redevelopment, investments in transit, greening, and other infrastructure, pollution prevention, and land use decisions. Region 5 continues to be involved in various workgroups that were formed to concentrate on pieces of the Campaign. These include clean air technology, aggregation, incentives and credits, development and energy. Out of these workgroups, we will identify activities to be implemented in both the short and long term that enable specific actions to occur that are necessary to combine cleaner air with redevelopment activities. These actions and activities may also qualify as reductions under the State Implementation Plan (SIP) or may improve the livability within a nonattainment area.

Regional activities in the State's broad program components include the following that ARD will undertake:

a. Ozone

- Provide technical assistance to Illinois in development of a SIP to address the Oxides of Nitrogen SIP Call.
- Provide technical assistance and advice regarding the status of the *American Trucking, Michigan, and Sierra Club* (Metro-East reclassification) cases, including U.S. EPA's direction in case development.
- Provide Illinois with guidance in the wake of these cases with regard to 8-hour designations and NOx SIP call development.
- Provide Illinois with active support in bringing the Metro-East area into attainment.
- Assist Illinois in resolving any technical issues associated with final rulemaking action on the State's 9 percent reasonable further progress plan
- Provide technical assistance and advice in development of upcoming reasonable further progress plans.
- Take appropriate rulemaking action on the Illinois Emissions Market Reduction System trading program.
- Provide technical assistance to Illinois in implementation of its Clean Fueled Fleet program.
- Take appropriate rulemaking action on Illinois' Phase II attainment demonstration plan for the 1-hour ozone standard and provide assistance in resolving any issues.
- Provide technical assistance in addressing issues and in resolving problems associated with demonstrating conformity of transportation and general programs, plans, and projects to the State Implementation Plan.
- Work with the State to continue implementing and improving upon existing Ozone Mapping System.

b. Title V

- Facilitate timely resolution of permit issuance rate impediments identified with State. Promote timely resolution of national issues, and common sense solutions for addressing newly identified concerns in a manner which promotes continued issuance of Title V permits.
- Work with State and HQ to streamline Title V where national opportunities exist and where state-specific efforts are feasible, including reviewing draft/proposed permits concurrently with public review.
- Provide technical assistance as requested by the State for issues such as applicability determinations.
- Review a broad range of draft permits consistent with the Permits Memorandum of Agreement and provide feedback at the staff level on permit content, organization, and structure during program start-up and on draft permits of concern where there is reason to believe that public scrutiny will be high, while minimizing review of those permits that include federally enforceable permit conditions to limit applicability of various regulatory thresholds, particularly where the State has issued similar permits previously.
- Provide all information relative to changes in Title V regulations and guidance in a timely manner.
- Provide general training opportunities as appropriate.

- Provide the State with specific concerns with regard to Title V approval, including enforcement and compliance provisions.
 - Consult with the Illinois EPA during the development of federal rules and policy to the extent feasible.
 - On a quarterly basis, Region 5 will submit the following information to Illinois EPA during Title V/NSR conference calls.
 - 1) Any sources with CAAPP applications pending for which significant public interest or a concern over environmental justice has been identified by USEPA;
 - 2) Any sources with CAAPP applications pending in which USEPA has any special interest, with explanation; and
 - 3) Any source with an issued CAAPP permit for which a petition for review by USEPA has been submitted, pursuant to Section 505(b)(2) of the Clean Air Act.
 - Approve Illinois' Title V program.
- c. Air Toxics
- Provide assistance in implementing MACT.
 - Participate in program development related to emissions monitored in the vicinity of O'Hare Airport by reviewing data with IEPA.
 - Work with Delta Institute and CRI stakeholders on CRI Pollution Prevention/ISO 14000 project.
 - Support Illinois' efforts to secure additional funding for air toxics monitoring.
 - Assist Illinois in implementing their air toxics monitoring network and in conducting data analysis.
 - Coordinate and advance the understanding of mercury impacts and seek reductions as appropriate.
 - Coordinate efforts to develop state toxics inventories and assist in the QA.
- d. Compliance Assistance and Enforcement
- Region 5 FY00 initiatives include coal fired utilities, refineries, MACT (degreasers, chrome platers, printing/publishing), HON sources, chemical sector sources, minimills, federal facilities, portland cement plants, ozone sources, a stack testing initiative in geographic priority area, and NSR/PSD/FESOP/Title V.
- e. Base Programs and National/Regional Priorities
- Air Monitoring:
 - Conduct Quality Assurance (QA) system audits of the Illinois EPA ambient air quality monitoring network and provide the service of QA performance audits when needed in coordination with Illinois EPA.
 - Continue to provide assistance and technical support for the Photochemical Assessment Monitoring Stations (PAMS) in coordination with Illinois EPA.
 - Work with the State to implement Lake Michigan PAMS data analysis plan.
 - Work with the State in reviewing and approving annual NAMS/SLAMS network plans.
 - Operate the national trend site for PM_{2.5} speciation.
 - Provide Illinois training in quality assurance and data reporting for PM_{2.5}.
 - Support Illinois' efforts to secure Section 103 funding for PM_{2.5} monitoring.

- Assist the state in obtaining additional funding for toxics monitoring.
- Assist the state in implement the air toxics monitoring network and conduct data analysis.
- Permitting (other than Title V):
 - Facilitate timely resolution of permit problems, including resolution of national issues and common sense solutions for addressing identified concerns.
 - Provide technical assistance as requested by the State for issues such as applicability determinations.
 - Review draft permits consistent with the Memorandum of Agreement, including FESOP, netting, all PSD permits and permits of concern where there is reason to believe that public scrutiny will be high.
 - Provide all information relative to changes in construction permit program regulations and guidance in a timely manner.
- Small Business
 - Promote regional communication and information exchange through quarterly conference calls and an annual conference.
 - Address questions, complaints, and compliance efforts regarding the Stratospheric Ozone Protection programs throughout the State
 - Work with the State to develop a mechanism to assess how well small business MACT outreach is furthering compliance goals.
 - Continue to host quarterly calls with state/local dry cleaner contacts.
 - Continue to provide ongoing technical assistance to state/local dry cleaner contacts. Region 5 will continue to provide a conduit for state/local dry cleaner contacts having issues to be addressed by USEPA headquarters and will continue to assure access for these contacts to federal documents, information and other resources that become available.
- Public Outreach and Education
 - Provide outreach information and educate stakeholders by providing materials, attending meetings, and making presentations on the Oxides of Nitrogen SIP call as requested by the State or other stakeholders.
 - Continue to support the Ozone Action Days and Partners for Clean Air programs through mailings of materials and other outreach activities.
 - Continue to be a “Partner for Clean Air.”
 - Participate in community forums on urban sprawl and hold at least another community workshop in the East St. Louis area on urban sprawl.
 - Assist Illinois in educating affected stakeholders on the clean fueled fleet program.
 - Pursue opportunities for public education and outreach using its Ozone Action Days brochures, particularly focusing on our geographic initiative minority communities, finding ways to effectively provide this information to parents of children that may be especially vulnerable.

- Expand and enhance ARD=s Homepage to provide both general and State-specific information on environmental problems and conditions in a manner that is readily understandable.
- Region 5 will continue to collaborate with Illinois EPA and environmental providers in Illinois to build and expand state capacity in environmental education.
- Continue outreach on asthma and its relationship to air pollution in the Greater Chicago area.

6. Federal Oversight - As part of the planned output for the air program, the Illinois EPA will submit information to the USEPA=s data system in addition to providing a variety of summary reports and analyses. The oversight arrangements listed here anticipate that USEPA will avail itself of such information as part of its oversight program. The remainder of this section discusses special arrangements, including on-site inspections for specific parts of the air program.

a. Ozone

- Vehicle Inspection and Testing - On-site audits or inspections of routine program are not recommended.

b. Title V

- FESOPs - Federally enforceable permit programs (e.g., NSR, PSD, FESOP, Title V) will receive review sufficient to establish programmatic integrity. Draft permits will be made electronically accessible to USEPA with paper copies and supporting documents provided upon request. USEPA will minimize the review given to CAAPP permits that are substantially similar to previously-issued permits that have been reviewed.
- Region 5 will work with Illinois EPA to jointly develop a complete and accurate source inventory.

c. Base Programs and National/State Priorities

- Air Monitoring - USEPA will review results of National Performance System Audit program and perform limited on-site audits or inspections on a case-by-case basis pursuant to joint agreement on the needs specific to the State program. For source emissions monitoring, USEPA will participate in witnessing selected stack tests in conjunction with the State.

B. Clean Land Program

1. **Program Description**

The Bureau of Land (BOL) implements the Clean Land Program. BOL's goals are to minimize generation of wastes, maximize proper management of waste generated, and maximize restoration of contaminated land. To achieve these goals BOL has divided its resources into six broad environmental focus areas and 17 BOL programs:

Hazardous Waste Management

- a. *RCRA Subtitle C Program* regulates the generation, transportation, and treatment, storage, or disposal of hazardous wastes to ensure that hazardous wastes are managed in an environmentally sound manner.
- b. *Underground Injection Control Program* regulates the underground injection of liquid hazardous waste into deep wells to ensure that underground sources of drinking water are protected from contamination. (Note: This program also regulates the injection of liquid non-hazardous waste as a disposal method.)

The Illinois EPA is currently under negotiation with USEPA (Region 5) concerning the return of the UIC primacy program to Region 5. The Agency has determined that the resources required to properly operate this program under the primacy provisions are not available from USEPA. The negotiations may result in a number of possibilities, including (but not limited to): 1) the complete return of the UIC program to Region 5; 2) the Agency's operation of UIC permitting, inspection, and inventory activities under contract with Region 5; or 3) the continuance of the Agency's operation of the primacy program with a substantial increase in funding by USEPA.

Nonhazardous) Solid Waste Management

- c. *RCRA Subtitle D Program* regulates municipal solid waste landfills. Although source reduction, reuse, recycling, and composting diverts a portion of the municipal solid waste from disposal, landfilling remains the most popular waste management practice.
- d. *Household Hazardous Waste Collection Program* diverts municipal waste containing hazardous materials (e.g., waste oils, petroleum distillate-based solvents, oil based liquid paints, pesticides) from landfills through one-day collection events and long-term collection facilities.
- e. *High School Hazardous Waste Collection Program* provides school districts with hazardous educational waste collections associated with one-day household hazardous waste collection events.

- f. *Partners for Waste Paint Solutions Program* offers consumers the opportunity to return paint products to paint retailers, local units of government, recycling centers, and material recovery facilities participating in the program.
- g. *Used Tires Program* ensures that used tires are managed properly and are recycled or converted to tire-derived fuel (TDF) for energy recovery or other beneficial use and that improperly stored/disposed used and waste tires are cleaned up.
- h. *Industrial Materials Exchange Service* provides an information exchange for hazardous and nonhazardous waste by-products, off-spec items, and overstocked or damaged materials with a potential for industrial reuse.
- i. *Underground Injection Control Program* regulates non-hazardous industrial waste injection wells, septic systems, storm water drainage wells, and other wells that inject fluids below the land surface. (Note: This program also regulates the underground injection of liquid hazardous waste into deep wells.)

The Illinois EPA is currently under negotiation with USEPA (Region 5) concerning the return of the UIC primacy program to Region 5. The Agency has determined that the resources required to properly operate this program under the primacy provisions are not available from USEPA. The negotiations may result in a number of possibilities including (but not limited to): 1) the complete return of the UIC program to Region 5; 2) the Agency's operation of UIC permitting, inspection, and inventory activities under contract with Region 5; or 3) the continuance of the Agency's operation of the primacy program with a substantial increase in funding by USEPA.

During the reversion process Illinois EPA commits to maintain a level of effort on the Class I and V wells equal to the commitment specified in the FY 2000 agreement.

Federal Cleanups

- j. *National Priorities List Program* investigates and cleans up Superfund² sites (i.e., the most serious hazardous waste sites in Illinois, as well as the nation).
- k. *Federal Facility Program* provides assistance to federal agencies responsible for conducting cleanups and provides assurance to local communities that federal facility sites have been cleaned up satisfactorily.
- l. *Site Assessment Program* collects and evaluates environmental information on uncontrolled hazardous waste sites which pose an unacceptable risk to human health and the environment. The information is gathered to screen sites for no further action

² Superfund generally refers to the USEPA program operated under the authority of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and Superfund Amendments, Reauthorization Act of 1986 (SARA), and National Oil and Hazardous Substances Pollution Contingency Plan of 1990 (NCP).

determinations, to advance sites in the Superfund investigation process (see item "o." below), or for Brownfields redevelopment.

State Cleanups

- m. *Response Action Program* administers cleanup at those sites where State or responsible party resources are necessary to clean up hazardous substances.
- n. *Site Remediation Program* provides participants (remediation applicants) with the opportunity to voluntarily clean up contaminated sites with Illinois EPA oversight.

Leaking Underground Storage Tank Cleanups

- o. *Leaking Underground Storage Tank Program* directs the cleanup of properties where petroleum or hazardous substances have leaked from state and federally regulated underground storage tanks and the Illinois Emergency Management Agency has been notified. BOL also administers the Underground Storage Tank (UST) Fund to help tank owners and operators pay for these cleanups.

Other Environmental Areas

- p. *Office of Brownfields Assistance* promotes the cleanup and redevelopment of abandoned or underutilized commercial and industrial properties.
- q. *Noise Pollution Control Program* assists in the implementation of noise pollution control regulations.

2. Program Linkage to Environmental Goals/Objectives

BOL utilized the SMART framework to illustrate the multi-level relationship between program and environmental objectives, and Bureau-specific goals.

ENVIRONMENTAL GOAL
Safe Waste Management and Restored Land

<u>Environmental Objectives</u>	<u>Environmental Indicators</u>
<ol style="list-style-type: none"> 1. By 2005, reduce or control risk to human health and the environment at 90,000 acres with contaminated soil, contaminated groundwater, or unmanaged waste. 2. By 2005, no significant releases from waste management facilities that harm off-site groundwater, human health, or the environment. 3. By 2005, reduce the waste disposed in Illinois from in-state sources to 34 million cubic yards per year. 	<p><i>[CORE] Acres of land where human health risk is reduced or controlled</i></p> <p>(Pending)</p> <p>Cubic yards of waste disposed in Illinois from in-state sources</p>
<u>Program Objectives</u>	<u>Program Outcomes</u>
<ol style="list-style-type: none"> 1. By 2005, reduce the annual amount of hazardous waste managed at commercial treatment/disposal facilities by 10%. 2. By 2005, 60% of operating waste management sites with groundwater monitoring systems will be in detection monitoring. 3. By 2025, 95% of waste management sites with groundwater monitoring systems have no measurable release to groundwater. 4. (Draft) - By 2005, 90% of RCRA-regulated and inspected sites will be in full compliance within 90 days of the inspection date. 	<ul style="list-style-type: none"> • Tons of hazardous waste managed at commercial treatment/disposal facilities annually • Tons of municipal waste recycled • Amount of municipal waste diverted from solid waste disposal facilities through Illinois EPA-sponsored collection events and alternative management methods • Number of hazardous waste management facilities conducting detection • Number of hazardous waste management facilities conducting assessment/compliance monitoring • Number of hazardous waste management facilities performing corrective action • Number of nonhazardous waste management facilities conducting detection • Number of nonhazardous waste management facilities conducting assessment/compliance monitoring • Number of nonhazardous waste management facilities performing corrective action. • <i>[CORE] Significant Non-Compliers (SNC) rate within compliance monitoring program</i> • <i>[CORE] Average number of days for SNC to return to compliance or to enter enforceable compliance plans or agreements</i> • <i>[CORE] Percent of SNC at which new or recurrent violations are discovered (by</i>

<p>5. By 2005, ensure proper closure and post-closure of all active landfills.</p> <p>6. By 2005, clean up 14,821 sites (about 90,000 acres):</p> <ul style="list-style-type: none"> • 13,000 state and federally regulated Leaking Underground Storage Tank (LUST) sites (22,750 acres) • 1,750 voluntary cleanup sites (10,475 acres) • 27 identified abandoned landfills (1,800 acres) • 37 National Priorities List sites (6,000 acres) • 7 Federal facility sites (50,000 acres) 	<p><i>reinspection or compliance order monitoring) within two years of receiving a final order in an enforcement action</i></p> <ul style="list-style-type: none"> • <i>[CORE] Percent of hazardous waste managed at Treatment, Storage, and Disposal facilities with approved controls in place</i> • <i>[CORE] Description of environmental benefits that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc., when information is readily available</i> • Success rate of Compliance Assistance Program (% of generators in compliance at the beginning of compliance assistance surveys; % of generators in compliance at the end of compliance assistance surveys; and % of generators in compliance within 90 days after compliance assistance surveys) • Volume of solid waste transferred from open dump sites to landfills • Number of inactive nonhazardous landfills closed • Percentage of GPRA Baseline Post-Closure Universe facilities brought under control • Number of closure plans approved • Acres remediated annually at LUST sites based on the issuance of No Further Remediation (NFR) Letters • Acres remediated annually at site remediation programs based on the issuance of NFR Letters and 4(y) Letters • Acres remediated annually at abandoned landfills through the State Response Program based on constructions completed • Acres remediated annually at National Priorities List sites based on constructions completed • Acres remediated annually at Federal facilities based on the issuance of NFR letters 4(y) letters and Findings of Suitability for Transfer
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3. Performance Strategies

Performance strategies are plans to optimally employ resources and effectively direct BOL's efforts to achieve the three environmental objectives identified above. BOL's strategies for FY2001 are (1) reduce the quantity and hazardous nature of waste generated (particularly those wastes containing Persistent, Bioaccumulative, and Toxic (PBT) constituents); (2) increase recycling and reuse; (3) manage pollution and waste; (4) clean up releases of wastes and hazardous substances; and (5) provide incentives for cleanup and redevelopment of underutilized industrial and commercial properties. Each of these strategies affects at least one of the six environmental focus areas. The effectiveness of BOL in implementing the strategies will be measured through the accomplishment of the program objectives (listed above) by the different BOL programs. Below is a description of program activities for the six environmental focus areas for FY2001.

Hazardous Waste Management

- a. *Help companies identify and apply cleaner technologies and practices.* BOL and the Illinois EPA's Office of Pollution Prevention (OPP) assist generators in identifying in-plant practices that may reduce the volume and toxicity of wastes (particularly those containing PBT constituents). BOL prepares Pollution Prevention Feedback Summary forms summarizing pollution prevention topics discussed with the generators. Completed forms are submitted to the Illinois EPA's Office of Pollution Prevention for follow-up assistance.

For FY 2001, BOL will support pollution prevention activities through continuing education of their staff, conducting joint inspections (with OPP) at RCRA generators, and by promoting pollution prevention opportunities during surveys/inspections.

- b. *Integrate pollution prevention into BOL's compliance and enforcement programs.* For FY2001, enforcement cases will be evaluated to incorporate supplemental environment projects³ that include pollution prevention measures (particularly in the area of PBTs).
- c. *Permit facilities that treat, store, and dispose of hazardous waste.* USEPA and BOL require owners and operators of hazardous waste management facilities to obtain and comply with permits prescribing technical standards for design, safe operation, and closure of their facilities. BOL has adopted the following permitting action plans in cooperation with USEPA:
 - BOL will ensure the safety and reliability of hazardous waste combustion by implementing the *Combustion Initiative's* permitting strategy: (1) establish

³Supplemental environmental project is an environmentally beneficial project that a violator agrees to undertaken in settlement of an enforcement action, but which the violator is not otherwise legally required to perform.

higher priority for combustion facilities resulting in the greatest environmental benefit or the greatest reduction in overall risk to the public; (2) ensure employment of sound science in technical decision-making; and (3) include public involvement in permitting decisions. For FY2001, BOL and USEPA will evaluate the use of a risk assessment by Trade Waste Incineration, Inc. (Sauget, IL)⁴ as a condition of its renewal application. Other activities planned are the review of renewal permit applications for McWhorter (Carpentersville, IL) and Akzo Chemical (Morris, IL).

d. *Ensure compliance by inspecting and monitoring individuals and waste management facilities that generate, transport, treat, store or dispose of hazardous waste and take enforcement measures when necessary.* To implement this strategy, BOL has adopted the following activities:

- Compliance Assistance Program - BOL will promote environmental compliance among small businesses by conducting compliance assistance surveys regardless of the volume of waste generated. The purpose of the survey is (a) to educate business owners and operators of their regulatory obligations under RCRA; (b) to achieve compliance through assistance rather than enforcement; and (c) to identify pollution prevention opportunities (particularly in the area of PBTs). BOL will notify a business of deficiencies in writing within 45 days of the survey⁵. A Compliance Evaluation Inspection will be conducted and appropriate enforcement actions will be taken if the business fails to correct all identified deficiencies within 90 days of the initial survey.

For FY2001, BOL will conduct 300 compliance assistance surveys. The compliance success rate⁶ of businesses with Federal identification numbers will be entered into the *RCRAInfo System*. BOL will include the results of all compliance assistance surveys conducted in the FY2001 Annual Performance Report.

- Compliance Evaluation Inspections - BOL will conduct inspections to verify compliance status with RCRA requirements. BOL pursues compliance through the use of inspections, Violation Notices/Non-compliance Advisories, and enforcement actions, where appropriate.

⁴Illinois' only commercial hazardous waste incinerator

⁵If a substantial and imminent danger is identified during a survey, BOL will cancel the survey and immediately initiate a Compliance Evaluation Inspection.

⁶Percent of generators in compliance at the beginning of compliance assistance surveys; Percent of generators in compliance assistance surveys; and Percent of generators in compliance within 90 days after compliance assistance surveys.

Ninety (90) waste management facilities in Illinois actively treat, store and/or dispose of hazardous waste. For FY2001, BOL will inspect 66 of these facilities.⁷ These inspections may include Compliance Evaluation Inspections (CEI), Compliance Schedule Evaluations (CSE), Comprehensive Groundwater Monitoring Evaluations (CME), Operation and Maintenance Inspections (OAM), Closure Verification Inspections (CVI), and Financial Record Reviews (FRR). In addition BOL will inspect 100 generators regulated under RCRA. There are several criteria for selecting these 100 generators for inspection. Generators targeted for inspection may possess any combination of the following criteria:

- (a) Filed a 1998 Hazardous Waste Annual Report indicating they are an active large-quantity generator (LQG) of hazardous waste;
- (b) Produce hazardous waste containing persistent, bioaccumulative, and toxic (PBT) constituents;
- (c) Have a history of non-compliance;
- (d) Have an active enforcement order issued against them;
- (e) Are identified in RCRAInfo as a G1 and notified after January 1, 1990;
- (f) Filed a Hazardous Waste Annual Report (as an LQG) in the past but no longer file reports;
- (g) New generators;
- (h) Small-quantity generators outside of the Des Plaines Region.

In some BOL regions, the LQG universe has been inspected in the past 2-3 years. In those instances, BOL will focus on other categories of RCRA generators that meet one or more of the criteria identified above. BOL anticipates that these inspection activities may identify some LQGs that are currently non-filers.

All violations discovered by BOL will be addressed in accordance with the USEPA Office of Enforcement and Compliance Assurance's *Hazardous Waste Civil Enforcement Response Policy* (dated March 15, 1996; effective April 15, 1996).

BOL will also conduct "other" inspections as required including sampling inspections, citizen complaint investigations, follow-up inspections, case development inspections, non-financial record reviews, etc. In addition, BOL will conduct joint inspections with new Region 5 inspectors for the purpose of providing training and education.

- BOL's field staff will continue its participation in Illinois' aggressive criminal/enforcement program by providing technical assistance in gathering media samples and other environmental data/evidence for case development by law enforcement agencies.

⁷BOL is committed to inspect all hazardous waste management facilities scheduled for FY2001 and will provide written justification to USEPA Region 5 (upon request) for those facilities that are not inspected (e.g., hazardous waste management operations may have ceased prior to the time of the scheduled inspections).

BOL is a member of the Illinois Environmental Crimes Investigators Network, a partnership among the Illinois Attorney General, Illinois EPA, Illinois State Police, Illinois Department of Natural Resources, the Illinois State's Attorney's Association, and local law enforcement. For FY2001, BOL will continue to be an active member of the Network through its civil and criminal environmental investigations, response to Network Environmental Crime Hotline referrals from the Illinois Attorney General's Office, and contribution to the Network newsletter.

BOL also represents the Illinois EPA as a member of the Midwest Environmental Enforcement Association (MEEA), an alliance of regulatory, law enforcement, and prosecutorial agencies from Illinois, Iowa, Kansas, Kentucky, Michigan, Minnesota, Missouri, Nebraska, Ohio, Oklahoma, Ontario, and Wisconsin. MEEA provides local, state, and Federal enforcement agencies with training and professional networking opportunities for the exchange of enforcement-related information. For FY2001, David Jansen (BOL Springfield Regional Manager) is the MEEA secretary and the Illinois Executive Committee member.

- BOL will verify the safety and reliability of hazardous waste combustion in conjunction with the *Combustion Initiative*. For FY2001, BOL and its contractor will monitor Trade Waste Incineration, Inc. (Sauget, IL) by reviewing trial burn plans, observing two trial burns, and assessing the trial burn results. In addition, BOL will conduct two Compliance Evaluation Inspections at this facility.
- e. *Review and approve closure plans for units where waste management facilities once stored, treated or disposed of hazardous waste.* Many facilities which previously stored, treated or disposed of hazardous waste have elected not to obtain a RCRA permit for these activities. These facilities must complete closure of all the units where they conducted hazardous waste management activities. Closure must be carried out in accordance with plans approved by BOL.
- BOL will ensure that 90% (or 50 of 56) of the Government Performance & Results Act Baseline Post-Closure Universe⁸ will have “approved controls in place” by FY2005. Approved controls in place mean: (a) a post-closure permit has been issued for the unit, or an existing permit at the facility has been modified so that the unit in question is subject to the post-closure permitting standards; (b) the unit has achieved clean closure, as verified by BOL; (c) the unit has properly closed with waste in place, as verified by BOL, and a post-closure plan, or similar enforceable document (such as a consent order), covers appropriate post-closure obligations including 40 CFR Part 264 Subparts F and G groundwater monitoring and cap maintenance requirements; (d) the unit is situated among solid waste management units, and closure and post-closure obligations at the unit are

⁸Government Performance & Results Act Baseline Post-Closure Universe are those facilities undergoing closure of all of its hazardous waste management land-based units (e.g., landfills, waste piles, surface impoundments) as of October 1, 1997.

covered by a corrective action order or a similar enforceable document (including 40 CFR Part 264 Subparts F and G groundwater monitoring and cap maintenance requirements as applicable); (e) the unit has been accepted by one of the State or Federal cleanup programs for remediation; or (f) the application of other controls approved by BOL (as determined on a case-by-case basis).

At the end of FY2000, 79% (or 44 of 56) of the Government Performance & Results Act Baseline Post-Closure Universe had approved controls in place.

For FY2001, BOL will issue two additional post-closure permits increasing the percentage of facilities on the Government Performance & Results Act Baseline Post-Closure Universe with controls in place to 82%.

- f. *Require investigation and cleanup of hazardous releases at waste management facilities.* The investigation and cleanup of hazardous substances at RCRA facilities is called corrective action. Facilities generally are brought into the RCRA corrective action process when there is an identified release of hazardous waste or hazardous constituents, or when BOL and USEPA are considering a facility's RCRA permit application. The elements of corrective action are an initial site assessment, an extensive characterization of the contamination, and an evaluation and implementation of cleanup alternatives, both immediate (e.g., drum removals) and long-term (e.g., groundwater pump and treat). BOL has authority to direct corrective action at facilities permitted after April 1990, while USEPA is responsible for directing corrective action at all other permitted facilities. Corrective action at closed facilities or those undergoing closure of all regulated units can only be directed by USEPA. BOL will initiate the following action plans in FY2001:
- BOL will ensure that human exposure will be controlled at 26 of the 28 (or 95%) Cleanup Baseline Universe⁹ facilities and groundwater releases will be controlled at 20 of the 29 (or 70%) Cleanup Baseline Universe facilities by FY2005. Human exposures have been controlled at 13 facilities, while groundwater releases have been controlled at 14 facilities. During FY2001, BOL will ensure that (1) human exposures are adequately controlled at four more Baseline facilities; and (2) groundwater releases are adequately controlled at three more Baseline facilities.
 - By FY2005, BOL will ensure that corrective measures are implemented at a total of 30 facilities. BOL is responsible for directing corrective actions at 40 permitted RCRA facilities. Corrective measures have already been implemented at 15 of the 40 facilities.

⁹USEPA developed the RCRA Cleanup Baseline Universe list in conjunction with the states as a result of a mandate in the Government Performance & Results Act requiring USEPA to measure and track the program progress. There is a total of 1,712 facilities on the RCRA Cleanup baseline. There are 56 Cleanup Baseline Universe facilities in Illinois.

- BOL will seek the FY2001 supplemental funds for RCRA corrective action environmental indicator determinations at GPRA baseline facilities.

As they are submitted, BOL will review (a) new RCRA permit applications for interim-status or new facilities; and (b) Part B RCRA permit renewal applications. This will increase the universe of facilities for which Illinois EPA has corrective action authority.

- g. *Submit Authorization Revision Application (ARA) in accordance with federal schedules.* Since January 31, 1986, Illinois EPA has been authorized by USEPA to implement the RCRA hazardous waste program in Illinois. BOL has been granted authority to implement additional parts of the RCRA Program that USEPA has since promulgated (e.g., Corrective Action, Land Disposal Restrictions, etc.). Final action on ARA applications are being held up due to several statutory issues identified by USEPA's Office of Enforcement and Compliance Assurance. USEPA and the State of Illinois are currently working together to address these issues and possible statutory revisions.
- h. *Participate in Geographic Initiatives.* A geographic initiative represents an area deemed by USEPA to have sensitive environmental problems requiring extra attention. In addition, several of the geographic initiatives may include areas with environmental justice¹⁰ concerns.

Great Lakes Basin Initiative covers counties in all six Region 5 states (Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin). In Illinois, the eastern most sections of Cook County and Lake County are within this geographic area. This Initiative brings together Federal, state, tribal, local, and industry partners in an integrated approach to protect, maintain, and restore the chemical, biological, and physical integrity of the Great Lakes.

- i. The Agency is seeking the full amount of the Clean Sweeps (PBT) supplemental funding for FY 2001.

(Nonhazardous) Solid Waste Management

- j. *Enhance recycling and reuse opportunities.* BOL encourages environmentally sound solid waste management practices that foster recycling and that maximize the reuse of recoverable material. BOL administers the following solid waste management programs and services that reuse or reclaim materials from the municipal waste stream:

¹⁰Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no groups of people, including racial, ethnic, or socioeconomic groups, should bear a disproportional share of negative environmental impacts.

Program/Service	Waste Types	Recovery Method
Household Hazardous Waste Collection	Paints, Flammable Solvents, Oils, Aerosols, Household Batteries	Fuel Blended, Recycled
Partners for Waste Paint Solutions	Paints	Fuel Blended, Recycled
Used/Waste Tires	Whole or Shredded Tires	Supplemental Fuel for Power Plants and Industrial Facilities, Stamped Rubber Parts, Playground Cover, Flooring in Horse Arenas, Crumb Rubber for various applications
Industrial Materials Exchange Service	Acids, Alkalis, Other Organic Chemicals, Solvents, Oils and Waxes, Plastics and Rubber, Textile and Leather, Wood and Paper, Metals and Metal Sludges, etc.	Industrial Reuse

BOL also permits facilities that recycle and reuse waste materials as a part of their operations, such as landscape waste composting facilities, transfer stations, material recovery facilities, and storage/treatment facilities.

- k. *Foster waste disposal habits that promote a cleaner and safer environment.* Illinois has implemented landfill bans¹¹ and a variety of environmental programs that promote safe waste management through the segregation of municipal waste streams. BOL administers three environmental collection programs that aggregate waste containing hazardous constituents (a) Household Hazardous Waste Collection Program; (b) High School Hazardous Waste Collection Program; and (c) Partners for Waste Paint Solutions. These collections provide an opportunity for the wastes to be either reused or safely disposed in facilities designed to treat or dispose of hazardous waste. These programs also include public education elements that identify (a) household wastes containing chemicals that make their disposal in municipal waste landfills or incinerators undesirable; (b) safe use and storage procedures for household hazardous materials; and (c) consumer practices to reduce the amount and toxicity of household products discarded.

BOL also administers an industrial materials exchange service that helps divert materials from the industrial waste stream to businesses that can reuse the materials.

For SFY2001, BOL will conduct at least 15 household hazardous waste collections, with two collections performed in Lake County as Environmental Supplemental Projects. These one-day collection events will help divert municipal waste containing persistent, bioaccumulative, and toxic constituents (e.g., mercury-containing lamps) from solid waste landfills.

¹¹In Illinois, the following municipal waste materials are banned from landfill disposal due to their volume and/or toxicity: (a) used and waste tires; (b) landscape waste; (c) white goods (i.e., domestic and commercial large appliances) that have not had their hazardous components removed; (d) lead-acid batteries; and (e) liquid used oil.

1. *Ensure that used and waste tire handlers operate in compliance with state standards and cleanup used and waste tires that have been improperly disposed.* Each year, BOL conducts compliance inspections at: 1) more than 600 tire retailers; 2) all tire storage sites (approximately 230); and 3) more than 30 registered tire transporters (pursuant to BOL's Tire Transporter Audit Strategy).

BOL conducts approximately 100 used/waste tire cleanup activities and removes and recycles the equivalent of approximately 500,000 passenger tires annually. The three types of cleanups conducted by BOL include: 1) forced waste tire removals at sites that pose an immediate threat to human health and the environment; these include provisions for cost recovery actions; 2) 20 to 30 county-wide tire collections annually where Illinois citizens bring used/waste tires from their property to a central location for recycling and energy recovery; and 3) consensual removals where BOL removes up to 1,000 tires from an individual's property at no cost to the property owner (pursuant to a Consensual Removal Agreement).

- m. In FY2001, transfer from BOL to USEPA Region 5 responsibility for permitting and inspection of underground injection wells used by businesses to dispose of their nonhazardous waste. One on-site injection well at Equistar (Tuscola, IL) has been permitted for disposal of liquid nonhazardous waste.
- n. *Ensure proper closure and post-closure care of all old landfills by 2005.* BOL has identified 54 inactive landfills potentially subject to 1985 closure requirements,¹² but where the regulatory status is uncertain. Some of these landfills may be determined closed and covered subject to older regulatory standards and so may not be required to complete further closure or post-closure care. In FY2001, the BOL will evaluate the regulatory status of these 54 landfills to determine whether or not each is required to complete closure and conduct a program of post-closure care. Each landfill owner or operator will receive a written determination from the BOL identifying all obligations to close, maintain and monitor the facility. The BOL field staff will inspect each facility to ensure compliance and initiate vigorous enforcement, if necessary.
- o. *Evaluate the compliance status of all facilities required to monitor groundwater quality pursuant to State and Federal law by 2005.* Illinois groundwater quality regulations¹³ require RCRA-regulated facilities that routinely monitor groundwater quality as a permit condition to report all detections of certain contaminants. In FY2001, BOL will continue to identify and evaluate the status of each facility required to monitor groundwater quality to determine its regulatory status according to the following categories:

¹²Illinois regulations adopted in 1990 (35 IAC 814.501) required all municipal solid waste landfills which were unable to demonstrate regulatory compliance at the time or which subsequently initiated closure prior to September 18, 1992 to complete all closure requirements in accordance with regulatory standards adopted in 1985 (35 IAC 807).

¹³35 Ill. Adm. Code 620

Detection monitoring: These facilities are performing groundwater monitoring but have not detected concentrations of regulated contaminants;

Preventive notification: These facilities have detected contaminants but at concentrations below Illinois Groundwater Quality Standards;¹⁴

Corrective action: These facilities have detected contaminants at concentrations exceeding Illinois Groundwater Quality Standards.

Federal Cleanups

- p. *Address immediate dangers first, and then move through the progressive steps necessary to evaluate whether a site remains a serious threat to public health or the environment.* Superfund provides resources for removal and remedial actions at uncontrolled or abandoned hazardous waste sites. Various parties, including citizens, State agencies, and USEPA, discover such sites. Once discovered, sites are entered into USEPA's computerized inventory of potential hazardous substance release sites (i.e., Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)). BOL then evaluates the potential for a release of hazardous substances from the site by investigating site conditions. The data collected is used in an assessment and scoring system called the Hazard Ranking System to evaluate the dangers posed by the site. Sites that score above 28.5 on this System are eligible for listing on the National Priorities List (NPL).

BOL's site assessment priorities are to (a) identify potential hazardous waste sites; (b) identify need for emergency action; (c) evaluate the backlog of sites on EPA's computerized inventory of potential hazardous substance release sites; and (d) propose listing of appropriate sites on the NPL.

For FY2001 BOL will address these priorities through the following activities:

Activity	Planned for FY2001
Pre-CERCLIS Screening Action	4
Immediate Removal Coordination	10
Integrated Site Assessment	2
Expanded Site Inspection	10
Hazardous Ranking System	1
Preliminary Assessment	50
TOTAL	77

- q. *By 2005, complete construction on 85% (or 37) of the 44 Superfund sites.* Superfund sites are CERCLIS sites addressed through Federal cleanup laws (i.e., CERCLA, SARA, or NCP). The most serious Superfund sites are listed on the NPL. Since each Superfund site presents unique challenges, BOL employs a systematic approach to develop a cost-effective cleanup acceptable to the State and local community. This

¹⁴35 Ill. Adm. Code 620 Subpart D

approach is composed of a five-phase remedial response process¹⁵ consisting of: (a) investigation of the extent of site contamination (remedial investigation); (b) study of the range of possible cleanup remedies (feasibility study); (c) selection of the remedy (Record of Decision); (d) design of the remedy (remedial design); and (e) implementation of the remedy (construction completion). In Illinois, there are 45¹⁶ NPL (Superfund) sites.

The benchmark set for 2000 to 2001 is to issue three Records of Decision at three Superfund sites and complete construction at six Superfund sites:

Records of Decisions Planned for FY2001	
Site Name (City or County)	Illinois EPA Inventory Identification Number
Beloit Corp. (Rockton)	2010355004
DePue/NJ Zinc/Mobil Chemical (DePue)	0110300003
Southeast Rockford Groundwater Contamination (Rockford)	2010300074

Superfund Construction Completions Planned for 2000 – 2001		
Site Name (City or County)	Acres	Illinois EPA Inventory Identification Number
Parson's Casket Hardware Co. (Belvidere)	6	0070050017
NL Industries/Taracorp Lead Smelter (Granite City)	350	1190403009
Amoco Chemicals – Joliet Landfill (Joliet)	26	1978000001
Kerr-McGee – Reed-Kepler Park (West Chicago)	11	0430900012
Galesburg/Koppers Co.	105	0958040002
Tri-County Landfill Co./Waste Management of Illinois, Inc. (South Elgin)	66	0890800001

- r. *By 2005, complete transfer of seven Federal facilities.* Federal facilities are properties where the Federal government conducted a variety of industrial activities. Due to the nature of such activities, Federal installations may be contaminated with hazardous waste, unexploded ordnance, radioactive waste, fuels, and a variety of other toxic contaminants.

Under Federal law,¹⁷ Federal facilities must be investigated and cleaned up to the same standards as private facilities. Due to their size and complexity, compliance with environmental laws and regulations may present unique management issues for these facilities. Illinois EPA, USEPA, U.S. Department of Defense, and U.S. Department of Interior are conducting cleanup activities at 45 Federal facilities.

¹⁵Sections 300.430 - 300.435 of the NCP

16 39 NPL sites, 4 proposed for listing on the NPL, 2 deleted

¹⁷Comprehensive Environmental Response Compensation and Liability Act of 1980, as amended, and Executive Order 12580

Base Realignment And Closure (BRAC) sites have been the focus of BOL, USEPA, the U.S. Department of Defense, and other federal agencies because these sites are scheduled for closure and their reuse offers an opportunity for economic recovery of communities associated with those bases. Upon successful completion of the cleanup, a Finding of Suitability for Transfer (FOST) is issued by the Department of Defense and other federal agencies, with concurrence of USEPA and Illinois EPA. The FOST validates that site closeout requirements have been met and identifies any institutional controls (i.e., restrictions on land use).

Base realignment and closure activities are nearly complete at the 1,200-acre Naval Air Station Glenview and the 712-acre Fort Sheridan sites. The table below summarizes the actions completed and planned for these sites:

Site Name (Total Acres)	Illinois EPA Inventory Identification Number	Acres Realigned (Unit of Federal Government retaining control)	Acres Transferred (Entity accepting transfer of the property)	Acres Remaining to be Transferred in FY2001
Naval Air Station Glenview (1,200)	0311025007	70 (U.S. Navy)	1,120 (Village of Glenview)	10
Fort Sheridan (712)	0970555001	400 (U.S. Army Reserve and U.S. Navy)	272 (Lake County Forest Preserve District; City of Highwood; City of Highland Park)	40 (FOST issued to Lake County Forest Preserve District in September 1999)

For FY2001, BOL will assist in the development of the FOST on the remaining 10 acres at the Naval Air Station Glenview base.

In addition to BRAC sites, BOL conducts environmental restoration activities at sites formerly used, leased, or otherwise operated by the U.S. Department of Defense or any of its components. These sites (commonly referred to as FUDs) were closed and the property transferred to private, Federal, state or local government ownership (i.e., the U.S. Department of Defense no longer controls). BOL has identified 36 FUDs requiring further response actions. BOL anticipates that restoration activities at 7,310 acres of the 45,250-acre Crab Orchard National Wildlife Refuge (owned by the U.S. Department of Interior) will be completed in FY2002.

Also in FY2001, BOL will also amend cleanup regulations to include alternatives to the recording of the No Further Remediation Letter¹⁸ to form a permanent chain of title. For example, military properties normally do not maintain a chain of title for security purposes. In other cases, placing restrictions on land use may be difficult to implement (e.g., to place any institutional controls on a military property would require approval from the General Services Administration).

1835 Ill. Adm. Code 732; 35 Ill. Adm. Code 740

- s. *By 2005, conduct 50 brownfield assessments using BOL staff.* Redevelopment assessments are evaluations of contaminants at abandoned or derelict industrial properties with a potential for redevelopment and productive use. These assessments are funded by USEPA.

Since FY1995, BOL has conducted 27 redevelopment assessments. For FY2001, BOL will conduct four redevelopment assessments.

State Cleanups

- t. *By 2005, clean up 10,475 acres at 1,750 sites through the voluntary cleanup program.* The Site Remediation Program is one of the oldest state voluntary cleanup programs in the nation. Remediation Applicants may elect to clean up all contamination at the site or specific chemicals. Remediation objectives are developed by the Remediation Applicant using a risk-based approach which allows the use of engineered barriers and institutional controls. Successful completion of all program requirements results in a No Further Remediation Letter¹⁹ for the site.

In 2001, the voluntary Site Remediation Program will continue to assist Remediation Applicants in various stages of the cleanup process. BOL has targeted dry cleaning facilities and manufactured gas plants because these industries initiated sector-specific strategies (e.g., financial incentives, marketing programs, etc.) to deal with environmental cleanup issues.

BOL will also be proposing the following amendment to the land regulations²⁰ to facilitate voluntary cleanups:

- Allow the use of soil management zones during a voluntary cleanup. On-site management of non-hazardous contaminated soils will be exempt from disposal and waste piles standards if conducted within a soil management zone approved under the Site Remediation Program. Activities that may be conducted within a soil management zone include (a) placement of non-hazardous contaminated soil for structural fill or land reclamation, (b) consolidation of non-hazardous contaminated soil within the remediation site, and (c) removal of non-hazardous contaminated soil for treatment and return of the treated soil (with reduced contaminant concentrations) back to its original location.
- u. *By 2005, clean up 27 of 33 abandoned landfills under Illinois FIRST.* Illinois FIRST (a Fund for Infrastructure, Roads, Schools and Transit) is a five-year, \$12 billion program designed by Governor George H. Ryan to build, repair and upgrade Illinois' critical infrastructure. This program has dedicated \$50 million over the next 5 years to initiate cleanup at 33 abandoned landfills that pose a safety and environmental threat.

¹⁹35 Ill. Adm. Code 740

²⁰35 Ill. Adm. Code 740 and 742

In 1999, BOL completed construction at the 24-acre Carlinville Landfill. The benchmark set for 2000 to 2001 is to complete construction at the following five landfills:

Illinois FIRST Construction Completions Planned for 2000 - 2001		
Site Name (City or County)	Acres	Illinois EPA Inventory Identification Number
Western Lion, Ltd. (Mattoon)	26	0298050006
Service Disposal #1 (Mattoon)	440	0298050001
Waste Hauling Landfill (Decatur)	50	1158010001
Bi-State Disposal Inc. (Belleville)	40	1638160001
Bennitt (Rockdale)	13	1970850004

Leaking Underground Storage Tank (“LUST”) Cleanups

- v. *Protect human health and environmental quality by cleaning up leaking underground storage tank systems.* The State of Illinois administers a comprehensive underground storage tank program under a cooperative agreement negotiated with the USEPA. The terms of this agreement require the Illinois State Fire Marshall to enforce preventive measures and BOL oversees the remediation of releases from state and federally regulated underground storage tanks.

At the end of December 2000, there were over 21,000 confirmed releases reported. BOL has an objective to clean up approximately 13,000 of these releases (or 22,750 acres) by 2005.

For FY2001, BOL will implement the following action plans to improve the cleanup of state and federally regulated leaking underground storage tanks:

- Owners and operators of underground storage tanks in Illinois may be eligible for reimbursement of cleanup costs from the underground storage tank reimbursement fund (UST Fund). Without the UST Fund, many tank owners and operators will be unable to properly or expeditiously clean up tank releases. The UST Fund is generated by a tax and an environmental impact fee on motor fuels. Expiration of the environmental impact fee at the end of 2002 will reduce the Fund by approximately \$50 million annually. In FY2001, BOL and the petroleum industry will assess options to ensure adequate revenue to continue the UST Fund through 2013.
- BOL will propose adding methyl tertiary butyl ether (“MTBE”) to the list of gasoline indicator contaminants in the Petroleum Underground Storage Tank regulations²¹ and adding risk-based remediation objectives for MTBE to the

²¹35 Ill. Adm.. Code 732

Tiered Approach to Corrective Action Objectives regulations.²² Similar changes will also be proposed to establish state-wide Groundwater Quality Standards for MTBE.²³ These changes will not affect the use of MTBE relative to Clean Air Act requirements but will ensure that MTBE is addressed whenever a release of petroleum fuel occurs.

- BOL will help underground storage tank owners and operators understand and comply with the regulatory requirements by expanding the availability of program information through printed materials, computer-based informational media, and speaking engagements. Illinois EPA will take appropriate formal (i.e., referrals to the Attorney General's or State's Attorney's Offices) and informal enforcement actions, as needed, to ensure that cleanups are proceeding to protect human health and the environment.
- Through Federal funding and collaboration among local, State and Federal governments, the BOL will use \$100,000 from a USEPA "USTFields" pilot to remediate abandoned underground storage tank properties selected by the City of Chicago. BOL will direct its contractors to remediate these properties and will work closely with the City to ensure that the remediation is consistent with the proposed future use of the property.
- BOL will propose revisions to the Petroleum Underground Storage Tank regulations²⁴ in 2001. Revisions include, but are not limited to, amendments to the requirements for investigations of groundwater and migration pathways, off-site access and electronic reporting. In addition, BOL will propose that Licensed Professional Geologists be authorized to certify portions of the site characterizations and cleanups.

Other Environmental Areas

- w. *Evaluate noise pollution concerns.* BOL supports a noise technical advisor who receives and evaluates complaints of noise pollution and acts on behalf of the Illinois EPA in cases brought before the Illinois Pollution Control Board as they relate to Illinois' noise regulations.²⁵
- x. *Provide financial incentives to support self-sustaining efforts by local governments and private parties to clean up brownfield sites.* Below are the financial incentives objectives for brownfields redevelopment in Illinois.

²²35 Ill. Adm. Code 742

²³35 Ill. Adm. Code 620

²⁴35 Ill. Adm. Code 732

²⁵ 35 Ill. Adm. Code 900-952

- By 2002, provide brownfield grants to 50 communities to investigate and assess contamination. The Illinois Brownfields Redevelopment Grant Program (BRGP) offers grants worth a maximum of \$120,000 each to municipalities to investigate brownfields properties.

Brownfields Redevelopment Grants may be used to perform environmental site assessments to determine whether a brownfields property is contaminated, and if so, to what extent. These grants may also be used to develop cleanup objectives and prepare cleanup plans, but cannot fund actual cleanup activities. Grant recipients are required to share in any grant award through a 70/30 match and to spend the grant within three years.

The Office of Brownfields Assistance seeks out BRGP grant recipients, evaluates grant applications, monitors grant activities, and reviews reimbursement requests to ensure eligibility and reasonableness of costs. Brownfields Representatives from the Office of Brownfields Assistance guide communities through both the grant application and implementation processes and will meet with city officials before they file a formal grant application to help determine cleanup potential and maximize grant dollars.

The Illinois EPA issued 18 grants by June 30, 2000. Since then, another five grants have been awarded. Six grant applications are currently in-house and under review.

- By 2005, provide \$10 million in brownfield loans under Illinois FIRST. The Illinois Brownfields Redevelopment Loan Program (BRLP) offers low interest loans to private parties and units of local government to clean up brownfields sites.

The maximum loan amount for any single loan application is \$500,000. These loans will pay for remediation and limited investigation and demolition activities. Cleanups funded by the loan program will take place under the Site Remediation Program.

The rules administering the loan program were adopted on August 8, 2000. No loans have yet been issued.

Cross-Bureau Initiatives

Below are three major initiatives that will require resources from more than one BOL focus area for their development and implementation.

y. Geographic Information System

By 2005, the BOL intends to publish on the Internet Geographic Information System (GIS) formatted data on all significant sites. The BOL is currently developing an

inventory of existing hardware, software and data sources and is developing GIS data quality standards for all BOL databases. By the end of FY 2001, the BOL will complete this inventory and will establish point locations as decimal degrees for all significant sites.

- z. *By 2002, integrate protection of natural resources into cleanup programs.* BOL and the Illinois Department of Natural Resources are in the process of developing a screening methodology and cleanup criteria to assure that cleanups protect plants and animals (eco-risk) as well as human health. This effort has been ongoing for about a year and will continue over the next several years, culminating in adopted rules in 2002.

aa. Community Relations

The Bureau of Land is committed to involving the public (e.g., citizens, community leaders, Agency personnel and company representatives) in the development and implementation of waste management and cleanup activities. The Bureau of Land, through the Office of Community Relations, disseminates information and promotes public involvement and education on the various Bureau programs through a variety of outreach mechanisms (e.g., public meetings and hearings, workshops and conferences, fact sheets and pamphlets, news releases, and responsiveness summaries). Community relations is engaged in an on-going process to maintain a dialogue with individuals and groups impacted by a site or facility, which can ease public concern, raise public awareness, and increase public trust.

4. **Program Resources**

Projected resources for the Illinois EPA BOL are identified by the environmental focus areas:

Program	Federally-Funded Work Years	State-Funded Work Years	Total Work Years
Hazardous Waste Management	59	41	100
Solid Waste Management	0	89	89
Federal Cleanups	45	0	45
State Cleanups	0	93	93
Leaking Underground Storage Tanks	29	47	76
Other Environmental Areas (Brownfields/Noise)	0	7	7
TOTAL	133	277	410

5. Federal Role

Hazardous Waste Management

- *RCRA Subtitle C Program*

- Provide compliance assistance to regulated entities subject to new federal regulations.
- Provide compliance assistance to qualifying small businesses in priority sectors (i.e., industrial organic chemicals and metal services).
- Provide assistance to Illinois EPA, if requested by Illinois EPA's BOL and/or Illinois' Small Business Program for Illinois EPA delivery of compliance assistance in accordance with USEPA's "Policy on Compliance Incentives for Small Business," issued May 20, 1996, effective June 10, 1996, for RCRA authority regulations.
- Coordinate compliance monitoring and enforcement efforts developed through the Greater Chicago Senior Managers Enforcement Committee.
- Discuss with, and/or explain to Illinois EPA: (a) new or revised federal RCRA rules, (b) new or revised Strategic Plans affecting HW, (c) USEPA's Hazardous Waste Civil Enforcement Response Policy, (d) USEPA's RCRA Civil Penalty Policy, (e) USEPA's computerized programs to determine financial status of RCRA-regulated entities, (f) USEPA's sector-, waste-, or rule-specific enforcement strategies, (g) RCRAInfo and other U.S. data management developments.
- Provide assistance to Illinois EPA in conducting financial analyses of violators' claim of inability to pay for injunctive relief and/or monetary penalties in formal enforcement actions brought by the State of Illinois.
- Inspect installations handling hazardous waste: Criteria for USEPA's selection of installations include (a) statutory mandate (i.e., installations managing hazardous waste in a manner for which RCRA requires a permit, which are owned and/or operated by State and/or local governments; and treatment, storage, and disposal facilities receiving CERCLA waste from off-site locations), (b) requests from Illinois EPA, (c) Federal facilities, (d) installations subject to open Federal enforcement judicial and/or administrative decrees/orders, (e) treatment, storage, and disposal facilities subject to RCRA permit conditions issued, administered, and enforced by USEPA, and (f) installations handling waste in USEPA's national and/or Regional priority sectors, such as metal services (electroplating and coating).
- Investigate and, if necessary, inspect installations handling certain commercial and/or industrial wastes in manners that illegally evade RCRA requirements for permits. Such operations include (a) waste-derived fertilizers, (b) metal foundries, (c) waste recycling, and (d) impermissible diluters of hazardous waste prohibited from land disposal.
- Inspect small quantity generators for the organic chemical sector as part of the National Performance Measure Strategy for non-compliance rates.
- Issue enforcement responses to RCRA violations detected by USEPA, or referred to USEPA by Illinois EPA, in accordance with USEPA's Hazardous Waste Civil Enforcement Response Policy, USEPA's RCRA Civil Penalty Policy, and relevant USEPA enforcement strategies.

- Conduct inspections at state and local TSDFs and coordinate any enforcement efforts with BOL.
- Work with BOL to inspect all federal TSDFs and coordinate any enforcement efforts with BOL.
- Work with BOL to identify and integrate the various RCRA facility universes. These universes include: GPRA baseline for CA high priority under the National Corrective Action Prioritization System (subject to corrective action), land disposal, treatment/storage. In addition, the Region will work with BOL in re-evaluating select facilities as requested by either party.
- Implement a plan for imposing corrective action at GPRA baseline facilities which do not or will not have RCRA permits.
- Work with BOL to develop an agreement for addressing the renewal of the corrective action portion of expired RCRA permits. The corrective action portion of all RCRA permits issued prior to 1990 were addressed by Region 5. However, the future workload will be shared by Region 5 and BOL under the agreement.
- Assist BOL with an expedited review and approval of ARAs submitted.
- Work with BOL and other Region 5 states to explore ways to expedite and improve the authorization process.
- Address the issues relating to Illinois legislation (e.g., Audit Privilege Law and Section 31 of the Illinois Environmental Protection Act) that has delayed the RCRA authorization process.
- Provide technical assistance and training (as needed) for the review of RCRA requirements.
- Provide RCRAInfo support and training as needed and requested by BOL. In addition, Region 5 will continue to maintain the Handler Identification module of RCRAInfo.

Solid Waste Management

- *RCRA Subtitle D Program*

- Work with the Superfund Division to ensure the completion and submittal of all Hazardous Waste Management Annual Reports and all Nonhazardous Waste Shipped Out-of-State Annual Reports.
- Provide technical information to BOL regarding the implementation of RCRA Subtitle D Part 258 through continued exchanges of information between approved States utilizing the Listserver and an annual meeting.
- Based on discussions with the state and review of state reported data, the UIC Branch, USEPA, Region 5, will assess the National core measures to identify significant issues and trends that have occurred in the BOL program during the past year and follow up as appropriate.
- Provide BOL the opportunity to provide input on the development of all major regulations, guidance, policy documents and issues.

Federal Cleanups

- *National Priorities List Program*

- Provide guidance, policy decisions, and program updates in a timely manner that may impact the State's program.
- Provide Core, Site Assessment, and other cooperative agreements yearly funding for effective implementation of the State's programs.
- Support State activities through participation in meetings, community involvement, co-hosting conferences, seminars, information sessions, as appropriate.
- Provide technical expertise wherever possible.
- Pursue new approaches to allow new technologies to be used in Superfund.
- Review and provide assistance on State work as requested or required.
- Provide lab analytical services if possible when requested by the State.
- Develop comfort letters and/or prospective purchaser agreements.
- Respond to requests to assist with transfer of federal properties for re-use or redevelopment.
- Complete and submit all Hazardous Waste Management Annual Reports and all Nonhazardous Waste Shipped Out-of-State Annual Reports.
- Inform BOL of any additional grant opportunities (e.g., Brownfields grants) that become available through USEPA.

Leaking Underground Storage Tank Cleanups

- *Leaking Underground Storage Tank Program*

- Provide forums to exchange ideas and information.
- Assist in locating and/or providing specific training needs identified by BOL.
- Provide projections on LUST funding, procedure and policy changes, and other information that will affect BOL's administration of the LUST program.
- Inform BOL of any additional grant opportunities (e.g., Brownfields grants) that become available through USEPA.

6. Oversight Arrangement

This agreement was developed under the National Environmental Performance Partnership System (NEPPS) guidance dated May 17, 1995. The oversight arrangements and BOL/USEPA's Region 5 relationship will follow the provisions of the NEPPS for the programs identified below.

RCRA Subtitle C Partnership Arrangement

Considering BOL’s past performance and the cooperative working relationship with Region 5, BOL will assume an independent self-management role in RCRA implementation and look to Region 5 for support and assistance in more specialized areas. To ensure an efficient and effective program, BOL will conduct the file audits and program self-assessments/self-evaluations in order to demonstrate the program’s success and areas of concern. In particular, BOL will:

- (a) Meet once on or about December 10, 2000 to discuss the *State’s Performance Report for the Performance Partnership Grant*;
- (b) Conduct an annual mid-year program conference call on or about July 10, 2000 to discuss the *State’s Self-Assessment*;
- (c) Conduct at least quarterly program component (e.g., permit/corrective action, enforcement, RCRA Info) conference calls
- (d) Conduct joint inspections; and
- (e) Investigate and respond to inquiries from Region 5 concerning facilities that do not appear to have been timely and/or appropriately addressed under Illinois’ enforcement program. This will include at least one annual meeting between Region 5 and IEPA to discuss the file audit results. Final file audit procedures will be developed and documented during FY2001.

Superfund Partnership Arrangement

USEPA Region 5 and BOL support each other’s activities throughout the Superfund process, including reviews of work plans, investigations, community relations plans, risk assessments, remedial designs, etc. In order to streamline our efforts and reduce duplication of effort, the Superfund Memorandum of Agreement identifies the oversight roles of Region 5 and BOL. These roles are outline in the table below:

Document for Review	Federal Role	State Role
Community Relations Plan	A (limited)	RC
Health & Safety Plan	RC	AUD
Quality Assurance Project Plan	A (limited)	AUD
Sampling Plan	RC	RC
Field Remedial Investigation Activities	AUD	AUD
Draft Remedial Investigation Report	RC	CNC
Final Remedial Investigation Report	AUD	AUD
Feasibility Study Work Plan	AUD	AUD
Applicable or Relevant and Appropriate Regulations Review	RC	RC
Draft Feasibility Study	RC	RC
Final Feasibility Study	AUD	AUD
Proposed Plan	A	RC
Record of Decision	A	CNC

Responsiveness Summary	RC	AUD
Final Design (Fund Lead)	RC	RC
Final Design (Enforcement Lead)	AUD	AUD
Remedial Action Change Orders (Fund Lead)	RC (subject to Block Grant initiatives)	RC
Preliminary and Final Inspections	P	P
Preliminary and Final Closeout Reports (Fund Lead)	A	A
Preliminary and Final Closeout Reports (Enforcement Lead)	CNC	CNC
Five Year Reviews (Fund Lead)	RC	RC
Five Year Reviews (Enforcement Lead)	AUD	AUD

	where	
A	Approve	Each Agency fully approves each document before the document can be considered final.
AUD	Audit	Prior approval or a response to the document is not required; however, the support Agency may do a review after the fact to determine conformance with established procedures. If there is a deficiency identified and the parties concur, then steps shall be taken to correct the deficiency. Non-concurrence on deficiencies should be elevated to the appropriate management levels.
RC	Review and Comment	The support Agency will review and comment on the designated document. The lead Agency does not need to receive an approval from the support Agency to produce a final document.
CNC	Concur or non-concur	The support Agency may either concur or non-concur on the document. Non-concurrence will require that the issues relevant to the document are elevated to the appropriate management level for potential resolution of the dispute.
P	Participate	The support Agency will be given adequate notice and supporting documentation to attend meetings.

LUST Oversight Arrangement

The BOL/USEPA Region 5 oversight arrangement will be similar to previous years. BOL will:

- (a) Conduct conference calls with the appropriate people from each Agency participating, as needed;
- (b) Conduct semi-annual meetings (at mid-year and end-of-year) with Region 5 to discuss the current status of the LUST program, changes in legislation, regulations, policies and procedures;
- (c) Provide semi-annual financial status reports; and
- (d) Report the progress of the leaking underground storage tank program in the Environmental Performance Partnership Self-Assessment report.

C. Clean/Safe Water Program

1. **Program Description** - The program elements are designed to protect and maintain water resources in Illinois. Three principal efforts work together to fully address all aspects of water resource protection and management. Several program elements serve all efforts, and are consolidated. These functions include data management; compliance assurance (including formal enforcement management systems approved by USEPA) for both facility operational parameters and competency of facility operating personnel; infrastructure financial assistance; program administration; and quality control and quality assurance for environmental monitoring.
 - a. **Water Pollution Control** - Illinois' point and nonpoint source program efforts are managed using a watershed management approach and two permit systems to control the discharge, treatment or disposal of wastewater. The program serves to manage and protect existing water resources; restore and maintain water quality in those waters which have degraded due to natural causes or human actions; monitor water quality and water resource conditions; manage watersheds and drinking water aquifer recharge areas; limit discharges into water resources; insure operational compliance through facility inspection and evaluation; participate in educational activities to insure that both owners and operators understand operation, compliance and administration requirements; provide compliance assistance and initiate informal and formal enforcement procedures; and administer financial assistance programs. Reporting on all compliance provisions contained in statute is done through PCS. Program operations are authorized by primary delegation for federal Clean Water Act and its regulations, specific delegation agreements for NPDES and grant/loan activities, and through requirements of the Illinois Environmental Protection Act. Program emphasis is being restructured to focus upon compliance through pollution prevention measures, using watershed management as the basis for redirecting and more closely coordinating existing activities, as well as the framework for developing new activities.
 - b. **Public Water Supplies** - Public water supplies program efforts focus on the provision of an adequate quantity of safe drinking water to Illinois consumers consistent with USEPA negotiated PWSS program guidance. Program activities are administered through the inspection and evaluation of water supply sources, treatment, distribution, administration and operation; water quality monitoring at the source, treatment entry point and distribution system; permitting of new or modified water supply facilities or treatment processes; administration of a Community Water Supply Testing Fund (CWSTF) program that provides analytical services and assistance with monitoring related requirements; provision of compliance assistance and initiation of formal enforcement procedures; participation in educational activities to insure that both suppliers and operators understand operation, compliance and administration requirements; administer financial assistance programs; and delivery of an annual report on the compliance history of all water supplies within the State. A source water protection program which is closely coordinated with the watershed protection initiative of the Agency is being used to protect surface and groundwater sources and to achieve ongoing compliance. Program operations are authorized by primacy delegation for federal Safe Drinking Water Act

(SDWA) regulations and through requirements of the Illinois Environmental Protection Act.

Enforcement of the federal Lead Ban is primarily accomplished through the Illinois Plumbing Code. Plumbing inspectors test flux and solder and examine pipe in both new and remodeled installations as a part of routine inspections to ensure that lead free materials are being used. Records of these inspections are maintained in a Lead Ban Compliance Report by the Illinois EPA Field Operations Section. Lead ban compliance for public water supplies is enforced through the Illinois Pollution Control Board regulations.

The Illinois Department of Public Health (IDPH) has responsibility for the non-community water supply (NCWS) program through a Memorandum of Agreement (MOA) that requires program operation to achieve compliance with federal SDWA and Illinois Pollution Control Board regulations. The MOA was modified to include the source water assessment initiatives required by the 1996 SDWA amendments. Through the MOA, the IDPH is completing potential contamination source identification within 1000 feet of non-community water supply wells. Other activities under the MOA include inspection and evaluation of non-community water supplies, water quality monitoring, provision of technical assistance, enforcement activities, operator training and demonstration of competence for NTNC water supply operators, and source water protection programs. IDPH has contracted program responsibility to some County Health Departments. Those County Departments perform inspection services, prepare reports, and provide data input and update and enforcement case referral to IDPH. Compliance reports for federal requirements are coordinated quarterly. These reports will be submitted at the same time as Agency reports.

The Agency provides analytical services for all contaminants for which a maximum contaminant level has been set by the Illinois Pollution Control Board. In order to be able to provide this service, the Community Water Supply Testing Fee Program was passed by the Governor and General Assembly in 1990. This voluntary program provides analytical services for all required monitoring including repeat and confirmation samples for an annual fee. In 1996, IDPH obtained the legislation and resources required to support specific NCWS monitoring efforts through a Laboratory Fee Program. The program establishes fees for specific analyses. Analytical services are available to all NCWSs serving fewer than 100 persons. Free analytical services are provided for schools. NCWSs serving more than 100 persons are required to use a private laboratory for analytical services. IDPH laboratories are working to receive certification for all parameters required under federal Safe Drinking Water Regulations as quickly as possible to ensure full monitoring compliance. They are presently certified for VOCs and IOCs, microbial nitrate, and nitrite parameters. They are working on SOC certification and have contracted with IEPA for SOC analyses.

- c. Source Water Assessment and Protection - Public water supplies in Illinois rely on both surface water and groundwater as the source for water being delivered to their customers. These waters are vulnerable to contamination from land use activities near the points of

source water withdrawal. Regulations pursuant to the federal Safe Drinking Water Act require that a Source Water Assessment (SWA) identifying potential source of contamination be prepared for all public water supplies in the state. The SWAs then must be made available to the public via the internet and in “hard” copy forms. The Agency has taken the responsibility for the preparation of these assessments for all community water supplies and has committed to assisting the IDPH in assessing the non-community water supplies. This program includes over 6,100 public water supplies in the state, of which approximately 4,100 are non-community water systems. In order to implement the program, Illinois EPA has established contracts and inter-governmental agreements with a number of other state and federal agencies, including: four state universities, Illinois Rural Water Association (IRWA), IDPH, and the United States Geological Survey (USGS). The Agency anticipates that the program will be completed by 2003.

As SWAs are completed, the Bureau will work, based upon available resources, with communities to develop source water protection management programs to minimize the risk posed by identified potential sources of contamination. The Agency acknowledges that source water management plans are not statutorily required and do not need Agency approval should a public water supply choose to prepare one. However, a number of State and Federal programs and regulations provide assistance to drinking water supplies wishing to protect their source water. These programs include: NPDES permits for upstream discharges; restrictions in construction and operating permits for wastewater facilities in proximity of surface water intakes and well setback zones; expansion of well setback zones establishing maximum setback zones; establishing regulated recharge areas, enforcement of technology control regulations; requirements for minimal hazard certification; and enforcement of groundwater quality standards. In addition, supplies participating in the vulnerability monitoring waiver program are required, through a special exception permit, to implement source water protection area management. We project that an average of 50 supplies will request Agency assistance through utilizing one or more of the above components to develop comprehensive source water protection plans each year for the foreseeable future.

2. **Program Linkage to Environmental Goals/Objectives** - The environmental goals, objectives and indicators include various water-related conditions. These indicators were chosen to reflect statewide progress in areas of water quality, safety of the drinking water provided to Illinois citizens and overall reductions in water-related pollutant loading. The section on Performance Strategies describes new or expanded activities that will be implemented leading to achievement of the environmental goals and indicators.

The "Watershed Management" strategy addresses those watersheds with significant water quality concerns. The specific activities listed under this strategy will direct Agency programs to improve or protect water quality conditions in streams or lakes (waterway and inland lake conditions). The point source control activities in the watershed strategy will also provide improved compliance for those discharges that most directly influence water quality (wastewater discharges). Further, the source water protection component will insure increased compliance with drinking water criteria (finished drinking water) and insure that the areas around community water supply wells (groundwater recharge areas) and surface

water supply watersheds are protected from hazardous sources of pollution. Finally, the sediment management program is intended to address the most significant remaining water-based sources of pollution to Lake Michigan (Lake Michigan conditions) and other surface waters.

The activities listed under "Program enhancements" will also contribute to achievement of the goals and indicators. The NPDES program delegation is expected to improve both understanding of and compliance with permit requirements. NPDES permit backlog management activities will place priority on discharges to impacted watersheds and should contribute to improved overall water quality (waterway and inland lake conditions). Public Water Supplies will focus on the development and initial implementation of innovative programs needed to carry out the provisions of the Safe Drinking Water Act Amendments of 1996, including the integration of source water protection provisions into Watershed Management. The expanded municipal compliance assistance programs will be directed at both wastewater discharges and public water supplies and should improve compliance rates in both areas (wastewater discharges and finished drinking water).

ENVIRONMENTAL GOAL

Clean Water - Illinois= rivers, streams and lakes will support all uses for which they are designated including, protection of aquatic life, recreation and drinking water supplies.

Environmental Objectives

1. Waterways with Good water quality conditions will increase 5% from 2000 levels by the year 2005. (Stream mileage in Good condition reported in the cycle 2000 305(b) report was 62.5%.)

2. The percentage of lakes in Good or Fair condition will remain constant from 2000 to the year 2005. (Lake acreage in Good or Fair condition reported in the cycle 2000 305(b) report was 97.0%).

3. The percentage of open shoreline miles in Good condition remains constant from 2000 to the year 2005. (Lake Michigan shoreline mileage in Good condition reported in the cycle 2000 305(b) was 100%.)

Environmental Indicators

The percentage of waterways that are classified as Good, Fair or Poor based on assessment of aquatic life use attainment. (Source: Sec. 305(b) report or electronic supplement)
Number and percent of assessed river miles, lake acres, and estuary square miles that have water quality supporting designated beneficial uses, including , where applicable, for: a) fish and shellfish consumption; b) recreation; c) aquatic life support; d) drinking water supply. (Source: 305(b) report or electronic supplement)

The percentage of inland lakes classified as Good, Fair, or Poor based on assessments of overall use support attainment. (Source: Sec. 305(b) report or electronic supplement)

The percentage of Lake Michigan open shoreline miles that are classified as Good, Fair, or Poor based on assessments of overall use support attainment. (Source: Sec. 305(b) report or electronic supplement)

Program Objectives

4. The total pollutant load discharged in the year 2005 will be 99.5% compliant with permit discharge limits.

Program Outcomes

The total pollutant load associated with non-compliance as a percentage of the total permitted load discharged. (Source: Annual Conditions Report)

*Percent of facilities implementing wet weather control measures. (Source: End of Year Report)

*Core Performance Measure (CPM). Type of measure (i.e., indicator, outcome, or output) reflects EPA's view of the CPM hierarchy and does not necessarily imply concurrence by IEPA.

ENVIRONMENTAL GOAL

Safe Drinking Water - Every Illinois Public Water System will provide water that is consistently safe to drink

Environmental Objectives

1. The percentage of the population served by community water supplies who receive drinking water with no short term (acute) or long term (chronic) adverse health effects increases to over 95% by the year 2005 (an increase of 5%).

Program Objectives

2. 50% of the community water supplies in the State with source water protection programs in place by 2005.

Environmental Indicators

The percentage of persons served by community water supplies that have not incurred violations of any acute MCL, chronic MCL, acute treatment technique, chronic treatment technique or health advisory during the year for drinking water standards that have been in effect for more than 3 years. (Source: Annual Conditions Report)
Number of: a) community drinking water systems and percent of population served by community water systems, and b) non-transient, non-community drinking water systems, and percent of population served by such systems, with no violations during the year of any federally enforceable health-based standard

Program Outcomes

Estimated number of community water systems (and estimated percent of population served) implementing a multiple barrier approach to prevent drinking water contamination.

ENVIRONMENTAL GOAL

Groundwater - Illinois= resource groundwater will be protected for designated drinking water and other beneficial uses

Environmental Objectives

1. A declining trend of groundwater contaminants in community water supply wells will occur through year 2005.

Program Objectives

2. The percentage of groundwater recharge areas (acres) with protection programs established or under development will increase to 45% by the year 2005. Furthermore, 90% of the state's population utilizing community water supply groundwater sources will have protection programs in place, or under development, by the year 2005.

Environmental Indicators

Trends for groundwater contaminant exceedances in community water supply wells using unconfined aquifers. (Source: End of Year Report)

Program Outcomes

The percentage of total recharge groundwater recharge areas (acres associated with water supply wells) using unconfined aquifers that have protection programs established or under development. The population served by groundwater dependent community water supplies with protected source water. (Source: Annual Conditions Report)

*Core Performance Measure (CPM). Type of measure (i.e., indicator, outcome, or output) reflects EPA's view of the CPM hierarchy and does not necessarily imply concurrence by IEPA.

3. Performance Strategies

a. Base Program

\$ Watershed Management -The Illinois EPA continues to utilize a watershed approach in the development and implementation of its ground and surface water programs. The Agency coordinates watershed activities, including TMDL activities, with other state and federal natural resource agencies utilizing the Watershed Management Committee as the coordination mechanism. The Unified Watershed Assessment will be used in the expansion of programs, and enhanced coordination of watershed activities with other state and federal agencies. Development of Comprehensive Watershed Implementation Plans are underway on two watersheds selected from the Unified Watershed Assessment 1999-2000 Restoration Schedule for Category I Watersheds in Need of Restoration. The development of watershed plans in targeted watersheds, utilizing 104(b)(3) funding, is an ongoing process, which has implemented 15 watershed efforts to date. Watershed staff is in place in regional offices to promote and assist watershed planning groups in the development of comprehensive watershed implementation plans. The National Nonpoint Source Monitoring Program Watershed, Lake Pittsfield Watershed, pilots many of the management practices utilized in predominantly rural watershed settings. This watershed is based in the Upper Mississippi basin, and will continue to be monitored until the close of the National Monitoring Program's 10-year cycle. The Watershed Implementation Plan (WIP) guidance document continues to be improved and reviewed by interested users and cooperative state and federal agencies. The WIP should be completed in FY2001. The WIP has been incorporated into the NPS Management Program as the format to be utilized in development of the TMDL implementation strategy. These strategies will thereby be in a watershed plan format upon completion.

To enhance program coordination and improve communication between agencies, a Natural Resources Conservation Service liaison position was established and is housed at Illinois EPA. This liaison position has been extended through FY2002 at a minimum. The Agency will work with USEPA to adapt planning programs to the goals of the Clean Water Action Plan.

The Agency will maintain and update the State Water Quality Management Plan, which identifies goals and objectives pertaining to activities having water quality impacts. The Continuing Planning Process (CPP) provides a description of the Illinois water pollution control program. The Agency will work with USEPA to update the CPP description. Utilizing funding provided through Section 604(b) of the Clean Water Act, the Agency will also continue to support Section 205(j) water quality management planning activities performed by Areawide Planning Agencies. Activities of these agencies will be reported separately to Region 5.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will promote watershed management through continued financial support through Section 104(b); by supporting the Region 5 Watershed workgroup; by working with Illinois EPA in the finalization and promotion of the Watershed Implementation Plan and revisions to the Continuing Planning Process; by providing technical assistance to other watershed projects; and by continued training of staff in watershed management planning methodologies.

USEPA will continue to coordinate the state/federal watershed work group to facilitate exchange of information, by arranging conference calls and meetings periodically or as special issues warrant. USEPA will provide technical assistance on environmental indicators development and planning issues and review of the Section 604(b) grant. USEPA will provide technical assistance to Illinois EPA through membership on the Watershed Management Committee, including development of the Watershed Implementation Planning Program.

Promotion of activities under the Clean Water Action Plan will continue in 2001, and the revisions to the continuing planning process and WQM plan will be reviewed. USEPA will promote watershed management through the American Bottoms and the Chicago River projects and through cooperation with Illinois EPA on the Illinois River Water project.

- Point Source Control Programs - Emphasis will be placed on managing those point sources that cause or contribute to water quality problems in priority watersheds. These sources will include both major industrial and municipal dischargers and significant minor dischargers. The Illinois EPA will track progress in reducing impacts from these sources as a measure of success in implementing this aspect of the watershed program. While the compliance assurance programs of the Agency (including field inspections, compliance follow-up and enforcement) are structured to provide timely response to all violations of NPDES permits as well as other state and federal requirements, programs are now in place to specifically track the pollutant loads associated with point sources in targeted watersheds. This information is used to make strategic enforcement decisions. The Agency has developed an indicator to report noncompliant loads from permitted point sources in priority watersheds. By identifying critical watersheds and facilities with significant levels of noncompliant load, the Illinois EPA prioritized its efforts at eliminating the most significant impacts to our water resources. This prioritization effort has proven to be an effective tool at reducing excess pollutant loading. The Illinois EPA will continue its efforts to further reduce excess (non-compliant) pollutant loads.

Illinois EPA will provide an inspection strategy and a plan for use of inspection resources at the beginning of the federal fiscal year. The strategy will identify the percentage of majors covered and address CSOs, stormwater inspections, CAFO inspections, pretreatment audits and inspections, and minor facilities. (CAFO and pretreatment inspections are discussed more fully in later sections). We will continue to focus on inspecting facilities in priority watersheds while addressing instances of noncompliance and maintaining a base level of oversight on a statewide basis. Full

compliance inspections will be scheduled at approximately 70 percent of major dischargers; a minimum of one inspection of each minor facility during each five-year permit cycle will be scheduled. The inspection plan will be provided via PCS and include major facilities and pretreatment programs targeted for inspection and the type of inspection planned. Scheduling is based on factors including facility compliance histories, consideration of areas with identified water quality impairment, instances of noncompliance identified during the year through sampling, review of reports, citizen complaints, and other means, as well as requests for assistance from plant operating staff and for inspections needed to support other Illinois EPA programs. Also, we will continue the program of technician reconnaissance inspections at wastewater treatment facilities. The level of approximately 8,500 site visits annually will be maintained to keep abreast of overall plant condition, equipment malfunction, poor effluent quality, or bypassing.

CSO inspections will be scheduled on a case-by-case basis in response to complaints, water quality problems, or noncompliance with permit requirements. Inspections of NPDES permitted stormwater discharges will include both scheduled inspection and response to citizen complaints. Emphasis will continue on construction site stormwater inspections in rapidly developing areas and areas where runoff from these sites is significantly impacting receiving waters. Staff additions planned in the Chicago and Metro East areas during FY2001 will add to our stormwater inspection resources in these areas.

Core Program Outcomes - Total pollutant load associated with non-compliance (Source: Annual Conditions Report), percent of facilities implementing wet weather control measures (Source: End of Year Report), and percent of watersheds with toxic pollutant loadings at or less than permitted limits (Source: Annual Conditions Report).

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA acknowledges the shift in program emphasis from major discharges to sources impacting priority watersheds. Pre-issuance oversight of individual permits has been essentially discontinued except for an annual negotiated small listing, and available federal resources on the permitting side will be focused on resolving common permitting issues associated with existing, new or revised federal policies or effluent guidelines, identifying and resolving issues associated with state delegation and initial operation of the sludge program. In addition to the permits selected for review prior to issuance, USEPA will review a number of randomly selected issued permits for conformance with Federal requirements and an evaluation of the quality of those permits. USEPA will also be responsible for advising the state of their interest in the NPDES permits for dischargers located in the USEPA place based efforts such as Gateway or Greater Chicago. Available federal resources for compliance and enforcement will be focused on compliance monitoring in priority sectors, including metal finishers, non-ferrous metals, petroleum refining, iron and steel, industrial organic chemicals, industrial inorganic chemicals, combined sewer

overflows; sludge inspection; storm water inspections, and enforcement of significant violation found in these sectors; compliance assistance and enforcement related to the sludge program; and support to the state for its efforts in priority watersheds, or where federal enforcement action is requested or warranted, as resources allow. In those areas where the USEPA has identified "place-based" initiatives, such as Greater Chicago, the Chicago River, American Bottoms, and the Gateway areas, USEPA will take the lead on working out a process to provide adequate program coverage that takes best advantage of the resources of both agencies, and other partners. USEPA will work with Illinois EPA in these place-based initiatives, to schedule direct assistance for the following activities:

1. Performing wet-weather inspections with emphasis on CSO and SSO inspections.
2. Continuing seminars for pretreatment POTWs.
3. Setting up seminars for industrial users of specific POTWs.

USEPA will provide this assistance as its staff resources allow and in consideration of the needs for similar assistance by other states in Region 5.

Critical Ecosystems Focus

American Bottoms - The USEPA Critical Ecosystems, Gateway and Upper Mississippi teams are working with the U.S. Army Corps of Engineers, St. Louis District Office, on a project to reduce the amount of interior flooding in the Metro East area. The primary focus of this project is to reduce flooding via the restoration of up to 15,000 acres of wetlands such that these natural areas will mimic earlier environmental conditions, absorb excess water and minimize the amount of flooding at any given time. The project's focus area is primarily the area within the historic American Bottoms area and some of the ancillary bluff lands to the east. USEPA supports this project because of the anticipated amount of wetlands that can be restored and because the agency can help the local communities resolve a long-standing environmental problem in a non-structural manner.

The Corps has asked USEPA's assistance in working with all local parties (including IEPA) to develop a comprehensive storm water plan that would reduce the amount of water and sediment due to erosion into streams that is being discharged from the bluffs. USEPA and IEPA's Collinsville office will work to develop and implement a locally approvable storm water plan.

Greater Chicago Area Waterways

Joint Role

There has been an extensive amount of interest related to the Chicago waterways in recent years. The Chicago waterways include the North and South Branches of the Chicago River, Chicago River, North Shore Channel, Sanitary and Ship Canal, CalSag Channel, and Lower Des Plaines River from Lockport Lock and Dam to the

I-55 Bridge. Flow in these waterways consists largely of effluent from three large sewage treatment plants in the Chicago Area. These waters are designated as Secondary Contact and Indigenous Aquatic Life Standards. The distance from Northern Chicago to the I-55 Bridge is approximately 50 miles. The lower 11 miles of this waterway are undergoing active review to redefine attainable beneficial uses and supporting water quality standards in anticipation that improved conditions resulting from various environmental programs and pollution reduction initiatives warrant an upgrade in the use designation. This is the first stage of a comprehensive review that will eventually address the entire Chicago Waterway system. In the interim IEPA will seek other venues to stimulate dialogue and consensus building regarding specific segments, aspects and resource allocations (sewer rehab, nonpoint source controls, open space initiatives, etc.) among stakeholders.

Region 5 and Illinois EPA believe that a watershed management approach for Chicago waterways, which would include structured discussions between stakeholders, is the best way to build consensus around solutions to remaining water quality problems.

Federal Role - USEPA Region 5 Water Division will coordinate comprehensive watershed planning with Illinois EPA for a structured stakeholder discussion on subjects as listed above.

§ Nonpoint Source Programs - Illinois EPA will continue to emphasize nonpoint source management programs using funding made available from Section 319 of the Clean Water Act. The Agency will implement the Nonpoint Source Program consistent with the approved NPS management program. Additional base program activities in those priority watersheds impacted by nonpoint sources will include expanded monitoring, consultation and technology transfer/awareness programs directed at contributing watershed land owners, intergovernmental working agreements, increased attention to permitted and unpermitted storm water sources and accelerated implementation of program activities identified in the approved Nonpoint Source Management Plan. Any additional Section 319 funding will focus on support of the Unified Water Strategy, and development of implementable watershed plans. In August 1999, Illinois was the fourth state in the nation to have its expanded nonpoint source program approved by USEPA. Additional resources derived from this status will be focused on development and implementation of watershed restoration action strategies and support of the TMDL effort in Illinois. The State will provide USEPA in the first biannual report, a description of the methodology to be utilized.

See the Bureau of Water program outputs in the Attachment.

Federal Role - Regional staff will support the expanded funding of nonpoint source monitoring and control activities that are part of the overall watershed program. In some cases, this may require consideration of activities that have not historically been considered for nonpoint source support at the federal level; however, activities must be eligible under Section 319 for funding. The USEPA, in cooperation with Illinois

EPA staff, will pursue approval of the designation of Illinois as an Enhanced Benefits State.

USEPA anticipates that Illinois will be submitting grant applications to support the nonpoint source program and to fund nonpoint source demonstration projects. USEPA will review these applications and provide assistance as needed. Also, Watershed Nonpoint Source Pollution Branch (WNSPB) will continue to work with Illinois EPA in the completion of grants previously awarded.

WNSPB will continue to provide technical assistance to the State and local agencies regarding practices that will minimize pollution from nonpoint sources such as proper pesticide management and no-till practices. USEPA will support use of nonpoint source funds to support clean lakes projects where appropriate criteria is met. USEPA will participate in the Watershed Management Committee at the State level and provide technical and financial support as feasible.

- Public Involvement - The key to the success of water quality programs is understanding and involvement of citizens with local knowledge of water quality problems. Opportunities for public input into Agency decisions are widely available at both the policy level and for individual decisions. Public comments are solicited on NPDES permits for individual discharges to waters of the state and formal public hearings are held when necessary to resolve outstanding issues. Advisory committees, with representation from a broad cross section of the affected public, are formed to help guide the Agency in the development of most standard proposals and implementation procedures. In addition, a more formalized procedure for public comment is provided through the Illinois Pollution Control Board hearing process for regulatory revisions and the Joint Committee for Administrative Procedures requirements for Agency procedures. The Watershed Planning Committee will continue to be utilized as a mechanism for coordination of all watershed planning and implementation activities, including TMDL development around the state. The Agency chairs that committee. Public and private organizations are invited to participate in watershed planning decisions. This will continue to be the coordination mechanism for Unified Watershed Assessments and other activities associated with the Clean Water Action Plan.

As new federal requirements for state administration of the provisions of the Clean Water Act are adopted, the Agency will continue to seek input from the full spectrum of public interests to develop effective, efficient and responsible implementation strategies. Three major program initiatives will continue to require extensive public input in FY2001 to define both the focus and scope of Agency implementation procedures. Total Maximum Daily Load (TMDL) development for impaired waters (both for general listing criteria and individual watershed plan development), Confined Animal Feeding Operations (CAFO) permitting requirements and Stormwater Permitting requirements for municipal storm sewer systems. Public involvement in these program areas is discussed elsewhere in this document under the specific program activity.

- Community Relations - The Bureau of Water is committed to involving the public (e.g., citizens, community leaders, organized groups and company representatives) in the planning, development and implementation of water pollution control and public water supply programs. The Bureau of Water, through the Office of Community Relations, disseminates information and promotes public involvement and education on the various Bureau programs through a variety of outreach mechanisms (e.g., public meetings and hearings, workshops and conferences, fact sheets and pamphlets, news releases and responsiveness summaries). Community Relations is engaged in an on-going process to establish and maintain a dialogue with individuals and groups impacted by a facility or project, which can ease public concern, raise public awareness, and increase public trust.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will participate in the Watershed Management Committee at the State level and provide technical and financial support as feasible.

- Wetlands Activities - The State will continue to develop and review wetland policy at the state and federal levels using the Interagency Wetland Committee (IWC). The IWC, composed of several state land/water management, regulatory and research agencies, including the Illinois EPA, will coordinate banking, mitigation and other wetland related activities.

The Illinois EPA anticipates receiving approximately 1500 applications for Section 401 certification within the next year. Many of these proposed projects involve wetlands. These applications, and plans for other projects submitted on a preliminary review basis, will be reviewed for compliance with the applicable water quality standards.

Federal Role - USEPA anticipates that eligible applicants in Illinois will be submitting requests for grants to support the wetlands program. In order to coordinate these efforts and insure a comprehensive and uniform approach to wetlands issues statewide, and so that related efforts in other areas of the water quality program are also coordinated with the wetland activities under these grants, USEPA and the Illinois EPA will cooperatively evaluate the wetland grants and work products in terms of the additional wetland and water quality planning and research needs of the state. USEPA will review these applications and provide assistance to the grant applicants as needed. Also, WNSP Branch will continue to work with Illinois in the completion of grants previously awarded.

WNSP Branch will continue to review selected Section 404 permits for compliance with the tenets of the Clean Water Act, and this will include coordination with the State 401 certifications on these permits. The Illinois EPA will evaluate and respond as required to applications for 401 certification, providing the proper notification to USEPA. Significant violations of the provisions of Section 404 (wetlands) will result

in USEPA enforcement actions. Enforcement actions in which USEPA and Illinois EPA have mutual responsibilities will be coordinated.

Technical assistance will be provided to the State and other agencies upon request or referral for assistance, in such areas as wetlands training, field identification and implementation of other agency programs.

- Source Water Protection - Illinois will continue aggressive implementation of a source water protection program under the 1996 SDWA. The Illinois EPA will continue producing source water assessments.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will maintain a federal role in support of the Illinois Groundwater Protection and Source Water Assessment and Protection Programs. In particular, USEPA will undertake activities to assist Illinois with increasing local source water protection and to help define USEPA's appropriate Federal role in support of local source water protection program.

- Groundwater Protection Program - Illinois EPA will continue improving the groundwater protection program to accelerate implementation of pollution prevention in wellhead protection areas for new and existing water supply wells. Source water assessment fact sheets and monitoring waivers were integrated to further leverage protection programs. Illinois EPA will continue the development of regulated recharge area and maximum setback regulations for proposal to the Illinois Pollution Control Board. The Pleasant Valley Public Water District regulated recharge area proposal is currently at First Notice. In addition, a proposal to amend Illinois' groundwater quality standards regulation to include a preventive notice/response level and Class I and II standard for Methyl Tertiary Butyl Ether was filed with the Board. In addition, the Illinois EPA will work with the Illinois Nature Preserve Commission and other stakeholders in the designation of 85 Dedicated Nature Preserves as Class III Special Resource Groundwater. Class III Special Resource Groundwater is established for: demonstrably unique (e.g., irreplaceable sources of groundwater) and suitable for application of a water quality standard more stringent than the otherwise applicable water quality standard specified; or for groundwater that is vital for a particularly sensitive ecological system.

The Groundwater program will also continue to work on integrating the Bureau of Land shallow groundwater monitoring at regulated facilities and sites, and the Illinois Department of Agriculture's rural pesticide monitoring program to develop an overall groundwater quality indicator.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will work with Illinois EPA in the development of a fully integrated CSGWPP by ensuring that all Federal criteria are addressed in the submittal.

- Lake Management Programs - The Governor's "Conservation 2000" program, initiated in SFY96, provides a wide range of conservation initiatives to be implemented by the Illinois Department of Agriculture, the Illinois Department of Natural Resources, as well as the Agency. Many of these activities are expected to directly or indirectly compliment the watershed program, particularly in the area of nonpoint source pollution control. Conservation 2000 includes funding to implement the Lake Management Framework Plan, a comprehensive program for improvement of Illinois inland lake resources. This program includes expanded technical and educational assistance to lake owners interested in developing restoration and protection plans; expanded ambient and volunteer lake monitoring efforts for assessment and management purposes; and limited financial assistance programs (the Illinois Clean Lakes Program and Priority Lake and Watershed Implementation Program) to provide grants for lake planning and implementation activities. Lakes with watersheds on the priority list will be given first access to the funding and technical assistance provided by the Conservation 2000 program.

See the Bureau of Water program outputs in the Attachment.

Federal Role - The Illinois Clean Lakes Program is essentially the same as the Federal Clean Lakes Program authorized under Section 314 of the Clean Water Act administered by USEPA. Although Section 314 funding is no longer available, USEPA will support the use of Section 319 funds to implement appropriate lake management measures both within the lake and their watersheds as set forth in approved clean lakes program plans and where consistent with the Illinois Nonpoint Source Management Program.

- Sediment Management - Sediment monitoring in conjunction with the Water Quality Monitoring Strategy will continue to be conducted by the Illinois EPA. As in the past, sediment quality data will be entered into the STORET data system. The Illinois EPA's stream and lake sediment classification systems will be used to evaluate sediment data and recommend areas of concern for additional monitoring or investigation as to the sources of contamination. Control programs will then be incorporated into the Watershed Management Plans mentioned above.
- State Revolving Fund Program - The Agency will continue to manage the low interest loan program for both wastewater and drinking water facilities. Based on recent changes to the drinking water program, which will become effective November 1, 2000, certain types of "private" community water supplies will become eligible applicants. Additionally, the Agency contracted with a financial consultant to evaluate the potential of leveraging both loan programs. Further discussions will take place in the next fiscal year prior to a final decision on leveraging.

Federal Role - USEPA will process all of the necessary paperwork to close-out the four projects that have been administratively completed and make those funds available for the SRF program.

See the Bureau of Water program outputs in the Attachment.

- b. Program Enhancements - In the Illinois EPA's self-assessment, a number of general program enhancements were identified in the three major program areas (water pollution control, drinking water and groundwater programs) that would address weaknesses or improve overall program effectiveness. The following summarizes commitments to implement these enhancements and associated federal roles:
- Safe Drinking Water Act Amendments of 1996 (SDWA) - There are a number of national work groups developing regulations required by the SDWA Amendments and the Agency is assisting on several of these. Tracking the progress of rule development allows some advance preparation to initiate State rule making.

Annual Compliance Reports will continue to be prepared and submitted to USEPA each year prior to the first of July and public notice will include the issuance of a press release that provides a summary of the report.

Annual PWSS Program Guidance is provided through Region 5 and gives direction for state core program activities, activities needed to retain DW-SRF grants and other recommended activities. With the EnPPA in place, a brief response will be made to the various sections and subsections of the guidance in order to keep Region 5 apprised of the work that has been done.

The State has set aside 10% of the FY1997 SRF allotment for the purpose of delineating and assessing source water protection areas pursuant to 1452(k)(1)(C) of the SDWA. A comprehensive work plan for use of these set-aside funds has been approved by the USEPA.

A number of regulations were approved by the Illinois Pollution Control Board on July 22, 1999, December 2, 1999 and August 24, 2000 to keep pace with the "identical in substance" requirements of the Illinois Environmental Protection Act including: Variance and Exemption Regulations; the new definition of a Public Water Supply; modification of monitoring requirements as appropriate, and development of a program to assist in and monitor Consumer Confidence Reports. As USEPA develops a final set of requirements for Radionuclides, those water supplies out of compliance will be addressed and a program implemented to assure a return to compliance in as short a time as practical.

The Public Water Supply Operations Act was amended on July 9, 1999 to enhance the Illinois EPA operator certification program for drinking water operators. The enhancements included the requirement for continuing education for certificate

renewal as well as other amendments necessary to meet the minimum standards for drinking water operator certification programs set by USEPA. The 35 ILL. Adm. Code 680 was adopted April 24, 2000 to implement the enhanced program.

Federal Role - USEPA will provide the State with guidance on all regulations and programs applicable for implementation or State regulatory development in FY2001.

USEPA will develop guidance for educational and technical assistance requirements. Input from States and USEPA Regional personnel will be included throughout the entire development procedure. USEPA personnel will actively participate in these programs whenever possible.

USEPA will review and provide comments on proposed legislation and regulations to insure consistency with Federal statutory requirements. Support during the legislative adoption process may also be provided.

- Collection System Operator Certification Program - The Agency initiated implementation of a voluntary certification program for collection system operators in April 2000. All wastewater collection systems in Illinois are included in the program. Applicants will be required to meet education and experience criteria and pass an examination in order to be certified. Experts in the operation and maintenance of collection systems assisted the Agency in the development of the new certification program.
- Small System Support - Technical assistance activities continue to focus upon providing operational compliance assistance to small community water supplies and toward reducing monitoring and reporting violations for small systems through operator education on a one-to-one basis during operational visits and sanitary surveys. Scheduled activities provide additional operational assistance through conferences, seminars and workshops co-sponsored with and provided by the Illinois Rural Water Association and the Illinois Section American Water Works Association. Presentations by Field Operations staff will also be made at workshops co-sponsored with the Illinois Department of Public Health, at the Illinois Potable Water Supply Operators Association (IPWSOA) annual conference, Illinois Rural Water Association meetings, and at local operator meetings. These presentations will include topics such as record keeping and reporting requirements; operational testing procedures; backflow program implementation and record keeping; new requirements of the SDWA amendments of 1996; groundwater regulations; State Revolving Loan fund for public water supplies; and other topics of interest that would help in the proper operation and maintenance of community public water supplies. Additional outreach is also being provided to community water suppliers with positive coliform reports to ensure proper collection of repeat sampling and issuance of boil orders and public notices. Illinois EPA provides technical assistance for Consumer Confidence Reports by providing the needed compliance information to water supplies for incorporation in the notices and participating in conferences, seminars and workshops to explain the requirements and respond to questions.

Illinois was one of the states selected for siting of a Small Public Water System Technology Center which will be located at the University of Illinois, Urbana - Champaign Campus. Program coordination has begun among the USEPA, Regions 5 and 7, the States, Universities and other organizations. Research grants continue to be awarded. Illinois EPA will participate on the Board of Directors and provide other assistance to the Center.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will continue to develop regulations and guidance for major Amendment requirements. Input from States and USEPA Regional personnel will be included throughout the entire development procedure.

See the Bureau of Water program outputs in the Attachment.

- Capacity Evaluation - All new systems which come into existence after October 1, 1999, are required to demonstrate that managerial, technical and financial resources are available to support operation in compliance with all State and federal drinking water regulations. This capacity development demonstration is a requirement of the Safe Drinking Water Act Amendments of 1996. Illinois adopted regulations to require this capacity demonstration for new public water supplies on July 29, 1999, and is implementing capacity evaluation as a part of the permits process.

Every year, the State will provide documentation to USEPA showing the ongoing implementation of both the new systems capacity development program and the existing systems capacity development strategy. The first report will be submitted by August 6, 2001. By August 6, 2001, the State will submit a report to EPA on the success of its capacity development strategy in helping systems with a history of significant non-compliance improve their capacity.

Federal Role - USEPA in cooperation with ASDWA Small Systems Committee will provide guidelines to the State on the August 6, 2001 report on the SNC list. USEPA Regional personnel will work closely with the State on the capacity development reporting requirements. USEPA Regional Office will remind the State of the capacity development reporting requirements through a memorandum.

- Technical and Public Education - These goals have been addressed since the inception of the Agency as a basic drinking water program element. A provision of the Amendments allows the USEPA Administrator to provide technical assistance to small PWSs, including circuit-rider and multi-state programs, training and preliminary engineering evaluations. Illinois has long supported technical assistance as a basic element needed to maintain compliance for all public water supplies, and has planned specific activities in FY2001 in addition to routine core program operational visits (Class II Sanitary Surveys) and presentations in response to invitations. Workshops designed to provide technical assistance in record keeping,

operational performance monitoring, cross-connection control and rule interpretation will be offered in several locations by the Agency, Illinois Section AWWA, Illinois Potable Water Supply Operators Association and the Illinois Rural Water Association. The Agency and Illinois Section AWWA will jointly provide technical assistance to small water supplies by presenting a description of the changes to the Safe Drinking Water Act and other State and federal regulations at the Annual meeting, the two regional Small Systems Annual Meetings held in October through seminars scheduled to be presented throughout the State, and through participation on the Illinois Section AWWA Small Systems Committee. Agency personnel will continue to participate in public civic organization programs as well as professional association activities to provide education in drinking water requirements and programs.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will develop guidance for educational and technical assistance requirements. Input from States and USEPA Regional personnel will be included throughout the entire development procedure. USEPA personnel will actively participate in education and training programs whenever possible.

- Legislative Changes - The need for possible legislative changes required to fully implement the Amendments will continue to be monitored, and actions taken as necessary.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will review and provide comments on proposed legislation and regulations to insure consistency with federal statutory requirements. Support during the legislative adoption process may also be provided.

- NPDES Program Delegation (Sludge Program) - The Agency will continue with rulemaking that will allow state assumption of the Federal sludge authority. Work completed during FFY98 identified a need to proceed with rulemaking before the Illinois Pollution Control Board as well as the Agency proceeding with its portion of the rules through its own course of action. During FY 99 work on development of the rule-making drafts proceeded through the development of the basic drafts. During FY 2001, the Agency expects to have the necessary rules in place to submit a delegation application to USEPA. Sludge rulemaking proposals will be submitted to USEPA early in development so that issues or concerns may be identified. The goal of Illinois=Sludge Management Program is 54% beneficial reuse of biosolids.

See the Bureau of Water program outputs in the Attachment.

Federal Role - Expedient review of the sludge rulemaking proposals as they are presented so that any fatal flaws are identified early in the process.

- NPDES Permit Backlog - Illinois has a backlog of expired NPDES permits as of September 28, 2000 of 22% for all permits and 20% for major permits. While a backlog is never a desirable condition, the expired permit conditions remain in effect until a new permit is issued. For facilities where permit requirements are not expected to change significantly over time, the impact of operating under an expired permit is minimal. The Agency has taken significant steps to reduce the backlog through the use of general permits and more efficient use of limited resources. We will further minimize the impact of permit backlog by targeting permit resources on reissuance of expired permits in priority watersheds with point source impacts. This initiative coupled with a continuing emphasis on major permits should effectively minimize the environmental impact of backlogged NPDES permit reissuance. The efforts of reducing the backlog started in FY2000 will continue into 2001. By April 30, 2001, the IEPA will work with the USEPA to jointly develop and subsequently implement an action plan, with milestones, specific outputs, and respective roles, to achieve the backlog reduction objectives of a backlog of expired permits no greater than 10% for Major NPDES permits by December 31, 2001, and for all permits by December 31, 2004. The work required for each permit has risen because of greater complexity and greater public involvement. This factor when input into the USEPA model for predicting the backlog suggests we will not meet the goal for majors. We will continue working towards improving this situation.

The model predicts we will meet the 10% backlog target for all NPDES permits by December 31, 2004.

Joint Role - USEPA and Illinois working together will expedite the issuance of the following permits in FY2001:

- MWRDGC - Calumet, IL0028061
- MWRDGC - Northside, IL0028088
- MWRDGC - Stickney, IL0028053

See the Bureau of Water program outputs in the Attachment.

Federal Role - As new federal regulations are issued that affect different industrial sectors, USEPA will identify specific issues that could impact expired permits and work with Illinois to develop appropriate language for permit issuance. USEPA will facilitate information exchange between the states on watershed protection, innovative approaches, etc., that could be used by Illinois EPA in this effort. Region 5 will also expedite the review of the draft general NPDES permits, which will require renewal during FY2001, so that the use of general permits continues to be a significant element of the permit backlog reduction effort.

- Pretreatment Delegation - In past Agreements, Illinois has committed to seeking delegation of the federal pretreatment component of the NPDES program. The Agency has done most of the preliminary evaluation of regulatory and statutory authorities that will be needed to operate the pretreatment program. We have also evaluated changes to the workload of existing staff needed to administer the

additional requirements of delegation. That analysis has been submitted to USEPA in the form of a preliminary delegation request. We have indicated that we do not expect that new state resources could be made available to add staff for this program expansion and that there would need to be substantial restructuring of permit and field operations responsibilities to deal with the increased workload. Given the new federal initiatives in the Clean Water Action Plan (particularly in the areas of stormwater and Concentrated Animal Feeding Operations) that will also place significant demands on these areas of the program, we do not believe that it is prudent to continue to seek delegation of the pretreatment program at this time. The State will continue to provide the extensive support functions that are currently in place. Teamwork between USEPA and Illinois EPA in this area has been excellent and the resulting joint permitting and compliance process is essentially transparent to the regulated community. The Agency will continue to evaluate the feasibility of pretreatment delegation as the workload associated with the new federal permitting requirements becomes better defined.

Illinois EPA will maintain Water Enforcement National Database (WENDB) elements and PCS, continue to identify and inspect Categorical Industrial Users (CIUs) in non-pretreatment POTWs (especially in the six-county area surrounding Cook County), issue construction and operating permits to such IUs that are consistent with Federal regulations, and conduct pretreatment audits of approved POTW programs at least once every five years, along with pretreatment compliance and reconnaissance inspections as appropriate in intervening years. We will also discuss the format and contents of a pretreatment effectiveness report with Region 5 during the year and prepare a report in a mutually agreed upon form, and continue to report annually on program performance measures (i.e., high quality sludge, POTW NPDES compliance rates, compliance statistics), and status of program activities.

Federal Role - The Region will continue to review and approve new POTW pretreatment programs that have been required through NPDES permits, and modifications to approved POTW pretreatment programs. The Region will work with Illinois EPA to public notice new programs and modifications, and incorporate same into POTW NPDES permits. The Region will also coordinate with Illinois EPA to provide oversight of POTW pretreatment programs, and requests copies of all pretreatment inspection reports generated by Illinois EPA staff, as well as all correspondence regarding review of POTW Pretreatment Annual Reports. Develop and implement a strategy to identify categorical industrial users (CIUs) in non-pretreatment POTWs (at least those in the six-county area surrounding Cook County), obtain information to help verify their status as CIUs and their compliance status, and conduct inspections and compliance follow up. Such a strategy would have the added benefit of furthering the goals of the Metal Finishing Strategic Goals Program, by addressing the facilities operating outside the regulatory system.

- Compliance Assistance/Enforcement - Illinois will continue its comprehensive assistance program to provide medium and small municipal wastewater facilities with information and technical support to assist in the identification of wastewater

performance trends and encourage timely planning for preventive and corrective actions. We intend to expand this program to include larger municipal and other non-municipal wastewater facilities as well as small community water supplies with a history of operational problems. Both inspections and compliance monitoring will be focused on priority watersheds, but Agency staff will also participate in extensive multi-media coordination of compliance activities. We will continue to target enforcement/compliance assistance as part of a watershed-based strategy to ensure timely and appropriate enforcement actions are taken for all facilities in SNC.

The Agency will continue to pursue the improvement of water quality and the achievement of sustained compliance via appropriate state actions. These include requiring an Illinois EPA permit consistent with applicable state requirements for the construction, modification, and/or operation of water supply facilities, water mains, wastewater treatment works, sewers, pretreatment, and mining facilities; administering the State's Build Illinois Compliance Grant program, loan assistance for drinking water and wastewater, and requiring properly certified operators as a vehicle for assuring that drinking water and wastewater treatment facilities are properly operated and maintained by qualified personnel. Illinois will also continue to routinely update PCS, SDWIS, and GICS, utilize SDWIS – State in production mode, as well as continue to assist USEPA in addressing information needs. Information will continue to be provided on all water programs.

Field staff will provide a level of compliance assistance which is appropriate for the needs of the facility at each inspection. This may range from a discussion of the inspection results to extensive operational assistance, including both assistance funded under the 104(g)(1) program and operator assistance at larger and non-municipal facilities and water treatment facilities. Activities in the 104(g)(1) program will continue at the level of past years, including mid-year and end-of-year reports, participation in regional and national activities, and assistance in maintenance of the national computer database.

See the Bureau of Water program outputs in the Attachment.

Federal Role - The Region will continue to provide any information on national or other state activities with a similar focus. USEPA will share compliance assistance tools with the State, review QNCR, review the draft tracking and reporting system, provide multi-media inspection training, and share the enforcement workload with the State to assure statewide/program-wide coverage of SNCs and geographic areas of concern.

The Region will continue to work with the State to identify additional Industrial Users (IUs) in non-approved POTWs that are subject to categorical pretreatment standards. The Region will also work with Illinois EPA to ensure that conditions included in State-issued construction and operating permits for pretreatment facilities at these Categorical Industrial Users (CIUs) are consistent with federal pretreatment requirements. USEPA will support operator assistance efforts and encourages Illinois

to fully participate in the National and Regional Operator Training Conference. USEPA will provide Illinois EPA with a list of facilities the Region intends to inspect in the fiscal year and the resources available for assistance.

Joint Role - The Region and Illinois EPA will continue to review reports submitted by CIUs, and inspect and sample high priority facilities.

Core Program Outcomes - The required data elements for Accountability Outcome Measures #1 and #2 and Output Measures #1 through 4 of the Enforcement and Compliance Assurance Programs will be maintained in the Permit Compliance System.

- Wet Weather Initiatives - IEPA will continue the efforts of controlling wet weather flows which include inspections of Stormwater (SW) related construction sites, industrial SW facilities, and facilities with Sanitary Sewer Overflows (SSOs) and Combined Sewer Overflows (CSOs). Maintaining stormwater related compliance and enforcement is a priority. Illinois EPA will focus on CSOs and SSOs issues including reissuance of expired or expiring NPDES permits with CSO control requirements and industrial and construction activities covered under the Phase 1 SW regulations. Priority will be given to those SW facilities which: (a) have failed to apply for coverage under NPDES permit, (b) failed to develop and implement the required Best Management Practices (BMPs), and (c) cause significant water quality problems. With the Phase II stormwater regulations finalized in December 1999, IEPA will develop and implement an outreach program for those entities, mainly municipalities that will be covered under the regulations for the first time. Regarding SSOs, State regulations prohibit overflows from sanitary sewer systems. The Agency will continue to use its enforcement authority to gain correction of these overflows when they are discovered. During the next year an inventory of SSOs, and an enforcement and compliance assurance implementation strategy for SSOs, will be undertaken. We will also continue to monitor the development of Federal regulations and make any changes to our programs that are necessary.

Federal Role - USEPA is in the process of issuing a 1999 SSO/CSO Enforcement Strategy, which provides direction on prioritizing inspections and enforcement of industrial and construction requirements for phase 1 industrial stormwater dischargers.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will provide information on P2 and AFOs to Illinois EPA.

Water Quality Standards Activities - Illinois EPA is currently involved in numerous standards initiatives that will carry into FY2001, several are multi-year efforts that will extend well beyond FY2001. After completion of a stakeholders workgroup on anti-degradation policies and implementation procedures in June 2000, a proposed new anti-degradation standard was filed with the Illinois Pollution Control Board

(IPCB) in August 2000. Hearings are scheduled for the first quarter of FFY2001. Preliminary reviews and proposed updates to specific general use water quality standards for metals and organics were completed and distributed to stakeholder groups for a “peer review” prior to filing with the IPCB during the first quarter of FFY2001, with public hearings following shortly thereafter. Review of the Lower Des Plaines River use designation and affiliated water quality standards are currently underway. Additional standards issues expected to receive attention during FFY2001 include nutrient standards, bacterial standards, the general use ammonia standard, mining related regulations, mixing zone application procedures for setting water quality based effluent limitations (WQBEL’s).

Federal Role - USEPA will work closely with the Agency during the process of developing revisions to water quality standards and any changes to use designations to insure that proposals submitted to the Illinois Pollution Control Board are approvable. USEPA will provide IEPA with Regional and national technical support and necessary data through the Clearinghouse. USEPA will consult with U.S. Fish and Wildlife Service (USFWS) on new or revised WQS adopted by Illinois. USEPA will provide timely review and approve or disapprove new or revised WQS adopted by Illinois.

- Great Lakes Water Quality Initiative - The water quality standards revision and permitting procedures mandated under the Great Lakes Initiative were completed and submitted to Region 5 in February 1998 and approved by USEPA on July 31, 2000. Activity during FY2001 will center around implementation of the GLI.

See the Bureau of Water program outputs in the Attachment.

- Biocriteria Development - Illinois EPA will continue to work with the Region on the development of biocriteria in FY2001. The Biocriteria Workgroup will continue to meet on a regular basis and bring together experts and interested parties to discuss the issues involved in formulating state biocriteria. Three sub-workgroups will continue to focus on specific, technical issues including evaluation of the Index of Biotic Integrity (IBI) for fish; development of a multi-metric Macroinvertebrate Biotic Index (MBI); and reference condition selection. These three sub-workgroups meet with state experts and interested parties on an as-needed basis and are supported by outside contractors for technical issues.

During FY2001, development of the new IBI will be completed, documented, and - evaluated. The Agency foresees full utilization of this new index to assess data collected through water year 2000 (through September 30, 2000) and reported within the cycle 2002 305(b) report. Development and evaluation of the multi-metric MBI will continue this fiscal year. Tetra Tech, Inc. has completed a preliminary analysis of Illinois EPA macroinvertebrate data and collection procedures. Based upon this analysis, Illinois EPA will conduct a pilot study in the summer 2001 on selected stations to provide data for additional metric development and quantitative sampling techniques.

See the Bureau of Water program outputs in the Attachment.

Federal Role - The Standards and Applied Sciences Branch at Region 5 will continue to provide expertise in workings of biocriteria in general, participate on Illinois Biocriteria Workgroup, and facilitate the exchange of biocriteria information between Region 5 states and others. Region 5 will assist the state in obtaining federal funds that may be available for the development of biological assessment tools.

- Development of Nutrient Criteria - Illinois EPA will continue participation in the Regional effort to develop nutrient criteria guidance by being a member of the regional workgroup. The workgroup will coordinate acquisition of nutrient monitoring data for Region 5, identify appropriate reference sites/conditions for lakes, streams and wetlands in each of the nutrient ecoregions within Region 5, provide input on the guidance for use by States and Tribes in developing and adopting nutrient criteria, and provide input to USEPA HQ as it develops criteria for each nutrient ecoregion. IEPA will also review data from the state to evaluate its quality and usefulness, and continue the collection of stream chlorophyll data initiated in the summer of 2000.

Federal Role - USEPA will coordinate the Regional nutrient criteria effort. USEPA will work with USGS-BRD and WRD to develop a nutrient database for Region 5. USEPA, Region 5 will participate in the national nutrient workgroup with USEPA HQ and the other Regions. USEPA, Region 5 will ensure that issues of concern to Region 5 States and Tribes receive adequate and appropriate consideration by the national workgroup. USEPA will publish national guidance on nutrient criteria applicable to Region 5 States and Tribes. Guidance will be developed for lakes and reservoirs, streams, estuaries and wetlands. States and Tribes will be expected to adopt nutrient criteria within three years of publication of final guidance.

- 305(b) Reporting - Pursuant to requirements in Section 305(b) of the Federal Clean Water Act, the Agency publishes a biennial "Illinois Water Quality Report" that provides an assessment of the water quality conditions of the state's surface and groundwater resources. In addition to characterizing statewide water quality conditions, the report is supplemented with fact sheets addressing general water quality conditions at a watershed level. An Illinois Water Quality Report is scheduled to be written and published in all even numbered years (e.g., 2002, 2004), while electronic updates of water quality data are scheduled to be submitted in odd numbered years (e.g., 2001, 2003). For this reporting period, the Agency will submit to USEPA by April 1, 2001, an electronic update to supplement the year 2000 Illinois Water Quality Report.
- Increase Monitoring Activity - A number of new short- and long-term monitoring activities were initiated by the Agency in FY2000 for a variety of reasons. Short-term monitoring efforts included the collection of Fecal coliform, *E. coli.*, water temperature, dissolved oxygen, pH, specific conductance, and total suspended solids.

Data began to be collected at 15 fixed-stations five times per month for three months to generate background data to review a potential transition from the fecal coliform to an *E. coli*. water quality standard. A number of these sites were located on the Fox River to specifically address 1998 Section 303(d) listing concerns and to utilize the data in future 305(b) assessment and 303(d) listings. Stream chlorophyll monitoring at 32 fixed-station sites and all intensive river basin survey sites was initiated in July 2000 to generate background data to support development of nutrient criteria. In addition, the number of monitoring sites on the Mississippi River was expanded by seven sites (from 4 to 11) to collect additional data and decrease the number of river miles between stations for the enhancement of Mississippi River 305(b) assessment. A station now exists approximately every 40-50 miles. New stream chlorophyll and expanded Mississippi River monitoring are two efforts that will continue into FY2001.

All of these activities have been conducted with existing resources. On an annual basis, special monitoring activities are requested to answer questions beyond those that can be answered by current ambient and intensive monitoring efforts. The added national emphasis on Section 303(d) listing, in conjunction with an annual desire to expand Section 305(b) assessments (i.e., stream miles and lake acres), requires additional monitoring and supportive documentation and justification for listing causes and sources of use impairments. Increased monitoring activity by IEPA is high priority for any new funding that may become available.

Federal Role - As requested, work closely with and provide assistance to Illinois EPA in the development and implementation of new and expanded monitoring activities. Seek and support additional funding for all Region 5 states.

- Five-Year Monitoring Strategy - The Agency is currently operating under a monitoring strategy documented in our "Surface Water Monitoring Strategy, 1996-2000" report (Document #IEPA/BOW/96-062). This report needs to be updated to reflect the significant changes and additions to state and national program directions. A review of the Agency's monitoring efforts and strategy was initiated in October 2000. The desire to expand assessment efforts (i.e., stream miles and lake acres); to utilize other entity data (i.e., MWRDGC and others); to respond to 303(d) listing concerns; to collect additional data to support TMDL studies; to improve upon nonpoint source pollution impact assessments; to strengthen quality assurance/quality controls efforts; etc., will all need to be specifically reviewed and addressed. A comprehensive draft of a "Surface Water Monitoring Strategy, 2002-2006" report should be available by the end of the fiscal year.

Federal Role - As requested, provide support to Illinois EPA in the development of a comprehensive, five-year surface water monitoring strategy.

- Fox River Water Quality Study - Three stream segments on the Fox River (DT09,DT69, and DT22) were added to Illinois' 1998 Section 303(d) list in the fall of 1999. It was subsequently felt by the Agency that additional evaluation of available

and supplemental data was necessary before extensive resources were expended to prepare TMDLs for these waters. Supplemental monitoring was conducted in June, July, and September 2000, particularly for fecal coliform and dissolved oxygen, the primary listed causes of impairment. *E. Coli*, suspended solids, water temperature, pH, specific conductance, rainfall information, and flow data were also collected. Results of the data collection effort will be utilized by the Agency to make future Section 305(b) assessment and Section 303(d) listing determinations.

Federal Role - At the time of supplemental data collection by Illinois EPA, USEPA Region 5 Staff were working in conjunction with the Conservation Foundation to collect data for the purpose of looking at the potential pros and cons of proposed dam removal activities on the Fox and DuPage Rivers. Any data collected under a USEPA approved quality assurance project plan on the three-subject Fox River segments will be forwarded to Illinois EPA. Such data would assist the Agency in making updated and more comprehensive 305(b) assessments and potential subsequent TMDL development decisions.

- Upper Mississippi River Issues - Illinois EPA will provide data for the Upper Mississippi River Water Quality Data Report and will work with several state and federal agencies on analysis of the project. IEPA will also participate on a large river biocriteria development workgroup supported by USEPA for the Upper Mississippi River.

Federal Role - The USEPA will work with the State and other federal cooperators to finalize an information database for the Upper Mississippi River Water Quality Data Report by FY2001. USEPA will also support large river biocriteria workgroup meetings by provided technical and financial resources to the states.

- Total Maximum Daily Load (TMDL) - The Illinois EPA's Watershed Initiative is providing a framework for successful coordination of nonpoint and point source program activities to improve overall water quality conditions. The TMDL process is an important tool for developing watershed-based solutions and therefore, an important component in watershed restoration efforts. The Agency will continue to rely heavily on the 305(b) reporting process for the identification of water quality limited waters in need of TMDLs under Section 303(d) of the Clean Water Act. A Request for Proposals (RFP) for the development of TMDLs in 13 watersheds (38 waterbody segments) based on Illinois EPA's 1998 303(d) List long-term schedule was publicized in April 2000. Proposals were accepted until June 13, 2000, at which time the Agency received bids from 12 potential contractors. The proposals were reviewed and contract(s) will be awarded in FY2001. Development of TMDLs on a watershed basis, including the development of an implementation plan, will be on a 2-year schedule for completion. Contractor(s) selected for TMDL development in each watershed will be responsible for the following deliverables and/or services:
 1. Develop a TMDL for each Pollutant associated with each waterbody segment in the specified watershed.

2. Each TMDL developed should have reasonable assurance of implementation in the watershed and be consistent with the applicable federal regulations and guidance issued by USEPA.
3. The contractor shall describe the methodologies in detail and submit documentation of the methodologies to be employed in the development of a TMDL.
4. The method chosen for including seasonal variation in the TMDL should be described in detail.
5. The contractor(s) will evaluate several scenarios in consultation with the Agency prior to recommending a TMDL for pollutant.
6. Prepare and submit written interim reports (there are 3 different reports required with language stipulating what each report must contain).
7. The contractor shall provide a final report which will contain but not be limited to the contents of the interim reports, description of public participation efforts, a plan for implementation of the recommended TMDLs and an executive summary.
8. The contractor will attend three public meetings and/or hearings to make presentations and explain the basis for the recommended TMDLs and the implementation plan.
9. The contractor will install the methodology or the water quality model used in the development of the TMDLs on the computer system, verify operational capability on the system and train Agency technical staff in the operation of the model.

The Agency is currently developing the draft 2-year 2001-2002 schedule of proposed watersheds for TMDLs for USEPA review for Section 319 funding. TMDLs completed for the seven watersheds on the initial 2-year schedule will be submitted to USEPA for approval in July 2001.

Illinois EPA, in a joint effort with USEPA, will complete TMDLs on two waterbody segments (Cedar Creek and Governor Bond Lake) selected by USEPA. Illinois EPA will submit the final TMDLs on these waterbody segments to USEPA for approval in the spring of 2002.

Utilizing the results of the special monitoring study underway, Illinois EPA will begin the development of TMDLs in 2001 for three Fox River segments. Final TMDLs will be submitted to USEPA for approval in the Spring 2001.

The Illinois EPA has incorporated its Assessment Database (ADB) into GIS to track 305(b) related assessments as well as 303(d) listed waters. Emphasis will continue to be placed on expanding modeling capabilities, such as BASINS, to support TMDL development. After the federal regulations take effect in October 2001, the Agency will revise the TMDL portion of the CPP.

The expanded TMDL regulations will require the development of implementation plans that will reduce or eliminate pollutant loadings to priority watersheds. Additional requirements pursuant to USEPA's expanded guidance for TMDL development will require major revisions to resource commitments and as a result,

significantly impact other components within the Illinois EPA's Watershed Initiative (i.e. technical assistance for watershed planning, characterizing watershed conditions, efforts that focus on watershed protection, etc.). In addition, resources for enhanced public participation and follow-up monitoring to determine TMDL effectiveness will need to be addressed.

As our neighboring states will have possible TMDL development in border water, which would be affected by loads from Illinois, the practice of providing notice of draft NPDES permits to our neighboring states will continue. This practice, mandated by regulations, will be a route of information transfer for point source loads.

The IEPA will develop TMDL priorities, commitments and schedules working off of the 1998 303(d) list. A TMDL action plan will be developed annually with milestones, specific TMDL outputs, and respective roles identified in the plan.

By April 30, 2001, the IEPA will jointly work with the USEPA to develop and subsequently implement an action plan, with milestones, specific TMDL outputs, and respective roles, to complete development of TMDLs in priority waters in FY 2001 and begin development of TMDLs for completion in future years.

During FY 2001, the IEPA will also begin drafting listing methodology applicable to the April 2002 303(d) list.

Federal Role - USEPA will continue to coordinate the State/Federal TMDL workgroup to facilitate exchange of information, by arranging conference calls and meetings periodically or as special issues warrant. USEPA will continue to work with State in the TMDL program review of methodologies, review of TMDLs, guidance and technical assistance in development of TMDLs. USEPA is interested in working with the States to improve the quality of the 305(b) report.

- Livestock Waste Management - The Agency has operated a livestock waste management program for many years, and has had field inspection staff specifically assigned to the program for over 15 years. Watershed Management Section staff and the Agency's Agricultural Advisor provide additional resources for the program. In 1996, the Legislature adopted the Livestock Management Facilities Act in response to public concern about environmental affects of livestock production facilities, particularly large hog confinement facilities. Among other things, this law gives the Illinois Department of Agriculture (IDOA) some additional responsibilities for regulating environmental aspects of these facilities. In 1998 and 1999, the legislature amended the Livestock Management Facilities Act to expand the coverage of facilities subject to the Act.

The Unified Strategy for Animal Feeding Operations was issued March 9, 1999. The Agency will work with Region 5 on an implementation plan consistent with available state resources. In FY2001, Illinois EPA will continue to develop the AFO inventory.

In developing the inventory, the Illinois EPA will compile data from existing sources based on field inspections, enforcement activities and permitting. Other sources will be added as deemed appropriate and reliable. This initial phase of the inventory process will be provided to USEPA for review. Following this review, additional data and a schedule for any outstanding activities necessary to complete the inventory of CAFOs by the target date of September 30, 2001, will be arranged by mutual agreement between Illinois EPA and USEPA.

The Illinois EPA during FY2001 will issue a general NPDES permit for concentrated animal feeding operations (CAFOs) including those with 1000 or more animal units. Authorization for coverage under the general NPDES permit will be issued for eligible facilities. Individual NPDES permits will be issued to CAFOs including those with 1000 or more animal units that may need additional permit conditions beyond those in the general NPDES permit. Through ongoing efforts, the Agency will solicit notices of intent to CAFOs or applications for individual NPDES permits, as the case may be. For CAFOs with 1000 or more animal units, the Agency will enforce the duty to apply for an NPDES permit in the event that a facility is subject to enforcement for a water pollution violation or violations. For CAFOs with more than 300 but less than 1,000 animal units that are subject to enforcement for a water pollution violation or violations, the Agency's enforcement will result in either (1) a change in the design or operation of the facility, or both, such that the facility no longer is a CAFO point source or (2) the submission of an application for a NPDES permit. The Agency will continue to work with Region 5 to review and revise as may be appropriate current state strategies for dealing with CAFOs in the context of the existing Federal strategy and emerging guidance including permitting, inspections, compliance, priority ranking criteria and enforcement. With regard to a strategy for inspections, Agency will continue inspections with the goal of inspecting all CAFOs in State priority watersheds by September 30, 2001.

In past years, the activities of livestock program field staff have been primarily driven by citizen complaints of air or water pollution. Efforts to initiate inspections of facilities located within selected targeted watersheds are hampered by the volume of citizens complaints, by follow-up inspections of previously identified problem facilities, and by limited staff resources. The Agency will continue to use Section 319 funds in FY 00 for development of a program to assist operators with livestock waste nutrient management plans and construction of livestock waste handling facilities that will correct water quality problems identified in the 305(b) report. The Agency will establish a schedule for inspection with the goal of inspecting all CAFOs in State priority watersheds that are impacted by livestock operations by September 30, 2001.

Federal Role - USEPA will update the CAFO survey of 1995 that delineates current AFO programs. USEPA will work with the State in developing the State strategy for NPDES permitting, inspections and enforcement. USEPA and the State will work cooperatively to conduct inspections and take enforcement actions as planned and required.

See the Bureau of Water program outputs in the Attachment.

- Coordinated Use of Enforcement Authorities - Efficient use of resources and effective approaches to promoting compliance can be optimized through coordination between USEPA and Illinois EPA regarding pursuit of enforcement activities. Periodic conferences with designated compliance and legal staff at USEPA and Illinois EPA should take place to discuss formal enforcement actions each agency anticipates initiating and to identify violators that are to be pursued as a cooperative effort by both agencies. Identification of such cooperative efforts should take into account the priorities of each agency, including targeted watershed considerations, geographic initiatives (such as those involving the Metro East area, Greater Chicago, and the Upper Mississippi River), priority pollutants, and the pretreatment and sludge programs. Where USEPA will take the lead in enforcement action, Illinois EPA would, in appropriate instances, provide supporting information and participate in proceedings and settlement negotiations. Such participation would apply to matters handled by both administrative orders issued by USEPA and by complaints filed in federal court through the United States Department of Justice (USDOJ). If warranted by the circumstances, the Illinois Attorney General's Office, on behalf of the Illinois EPA and the State of Illinois, might elect to intervene as a formal party to enforcement cases filed by USDOJ.

Federal Role - USEPA and, in some cases, USDOJ, would initiate and pursue the enforcement actions that are to be handled cooperatively with a federal lead. Penalties collected in such matters would be split with Illinois EPA in recognition of the degree of state support provided.

- Compliance Assistance Activities - The Agency is currently reviewing the comprehensive list of reporting requirements provided by the Region. This listing also contains recommendations for changes and improvements to the current process. The goal of this review is to further streamline reporting and oversight within the constraints of federal statutory and regulatory requirements.

See the Bureau of Water program outputs in the Attachment.

Federal Role - USEPA will provide a comprehensive list of current reports received from the Agency as well as a listing of reports and submissions required under federal statutes and regulations. They will work with the Agency to streamline necessary reporting and integrate this reporting into the self-assessment process to the maximum extent possible. In addition, a study of oversight and accountability activities has been undertaken. When complete, the study will be used by USEPA and the state to insure that these programs are both efficient and responsive to program needs.

4. **Program Resources** - The Agency plans to devote 323 work years in Fiscal Year 2001 to activities in the water program. Of this total, approximately 181 work years will be supported with State resources and 142 work years will be supported by federal funding under the Clean Water Act and Safe Drinking Water Act. The distribution of work years is expected to be as follows.

	Federal Estimated Work Years	State Estimated Work Years
Water Pollution Control	92	132
Public Water Supplies	50	49

This level of effort assumes that federal grant awards in FY2001 will approximate the amounts in the President's FY2001 Budget. Work years associated with groundwater protection activities are included in the numbers shown for the Public Water Supply program. The non-community water supply program is administered by the Illinois Department of Public Health and accounts for 12 of the federal work years above.

5. **Federal Role for Clean/Safe Water Program** - While new federal and state roles will be discussed and emerge during the next year, Region 5 commits to support Illinois in all efforts necessary to achieve the Agency's mission of clean and safe water. Administratively, Region 5 will continue to provide Illinois EPA timely information regarding available resources and competitive grants throughout the year and will work with the State to expeditiously apply for and receive appropriate awards. Region 5 will work with Illinois EPA to seek innovative ways to address broad regional priorities, including community-based environmental protection, pollution prevention and compliance assistance. Geographic initiatives are in place in the Greater Chicago and East St. Louis areas as well as the upper Mississippi River Basin in Illinois, and efforts will continue to foster relationships with these local areas and address specific community concerns. In addition to those listed elsewhere in this agreement, Regional activities in the State's broad program components include the following:

- \$ Region 5 commits to providing technical and programmatic assistance to Illinois EPA in the development of revisions to states water quality standards.
- \$ Region 5 will pursue improved state coordination 1) to establish regular and improved communication mechanisms so that the Region can be proactive in addressing upcoming issues and the states can better network with each other to provide better public service, and 2) so the states are better informed and active participants in regional and national goals.
- \$ Region 5 will develop a mechanism to report the progress of the Region 5 state's WHP programs.
- \$ Region 5 will develop and provide tools to the states to assist with the implementation of IL's WHP Programs.

- \$ Region 5 will develop a mechanism for working with or improving relationships with federal agencies to support IL's WHP Program.
- \$ Region 5 will continue to facilitate the development of electronic reporting of the progress of the Region 5 states SWP programs.
- \$ Provide assistance to IEPA in implementing their SWP Program.
- \$ Region 5 will work with Illinois EPA and other partners on developing plans to assess and remediate sediment pollution in the West Branch of the Grand Calumet River.
- \$ Region 5 will work with IEPA in regards to defining appropriate dredge material disposal sites for the Upper Mississippi and Illinois Rivers.
- \$ Region 5 will support IEPA's effort on the development of the Upper Mississippi River Assessment Report.
- \$ Region 5 will share with IEPA the Fate and Transport Report for Sediments and Nutrients for use in targeting watersheds for water quality improvements.
- \$ Region will support IEPA and other Illinois Agencies along with other States in the development of an Upper Mississippi River Water Quality Assessment.
- \$ Region 5 will also assist the State in expanding GIS/GPS capabilities.
- \$ Region 5 will assist Illinois EPA staff with interpretation of the National Primary Drinking Water Regulations, and with the development of regulatory implementation alternatives.
- \$ Region 5 will work with Illinois EPA to work through analytical methods as they arise.
- \$ Region 5 will work with Illinois EPA staff to apply in Illinois geographic initiative areas (Greater Chicago and Peoria Lake) the sediment GIS/database system currently used in the Southeast Michigan Initiative. The system is designed to visualize and analyze sediment data at sites in priority waterways.

6. **Oversight Arrangements** - USEPA needs to ensure the effective use of Federal funds. The role of oversight is to provide the parties to the agreement knowledge that a task has been completed, is of good quality and is in conformance with the applicable law and regulation. Oversight will focus on identifying and solving problems. IEPA and USEPA agree to quickly escalate issues so that they are resolved in a timely manner.

a. **Water Pollution Control Program** - The reporting mechanisms for the water pollution control programs are tied to the specific activity subjected to oversight. Some of these mechanisms have matured and are serving the needs of the oversight process quite well. Others are in stages of redevelopment and will continue to be reviewed and modified to better serve the needs of the party.

Grants/State Revolving Fund - This system has matured and serves the program well. No changes are anticipated.

NPDES Permits - The new oversight process is in the fifth year of implementation of revisions. Agreement has been reached to eliminate the formal pre-issuance review of each major permit. The current program involves staff to staff discussions and problem resolution before the drafting of an NPDES permit or modification. Conflict resolution procedures have been developed. The principal reporting system is the Permits Compliance System (PCS). Region 5 and the Agency are negotiating a list of

permits projected for reissuance for which USEPA would review prior notice. Applications for modification of NPDES permits are supplied as received. As the permits are issued or modified, PCS is updated. Minor permit activity is also noted in PCS. Targeted watershed permit activity reporting will be in PCS also.

Inspection Program - The current system of providing USEPA with an inspection strategy and plan at the beginning of the year is satisfactory. No changes are anticipated at this time.

Compliance Monitoring and Enforcement - The current system is working well. USEPA and the Agency will continue to update oversight and coordination activities to reflect changing program priorities discussed in this document.

Nonpoint Source Management Program - Current program reporting requirements will be reduced to an annual basis in the conditions of the Section 319 Grant, utilizing the Grant Reporting Tracking System (GRTS).

Chicago River - Region 5 will provide direct assistance to this principal place and ensure wetlands work targeting.

American Bottoms - Region 5 will work with Regional Teams and the U.S. Army Corps of Engineers (St. Louis District Office) toward flooding reduction and wetlands restoration. Region 5 will also investigate for a potential Class V project.

Quality Management Plant (QMP) - The review and approval by USEPA needs to be limited to only those issues required for approval, and oriented toward eliminating duplication of effort.

- b. Public Water Supply Program - The current process of providing periodic self-assessments on the negotiated PWSS program guidance will be continued. The Agency will continue work with the Illinois Department of Public Health to report on non-community water supplies in the Annual Compliance Report.
- c. Groundwater Program - The current process of providing self-assessments will be reduced. Groundwater protection progress will be reported electronically to the Region.

MULTIMEDIA PROGRAMS

D. Toxic Chemical Management Program

1. **Program Description** - This program is focused on chemical emergency response and toxic chemical management.
 - **Chemical emergency response** - This program deals with preparedness and response to environmental emergencies such as spillage or sudden accidental release of hazardous substances. Appropriate and timely response to these incidents is a high priority for the Agency. The general authority and responsibility of the State administrative agencies to deal with disasters and emergencies is specified in the Illinois Emergency Management Act and Illinois Emergency Operations Plan. Under this plan, the IEPA is the lead State Agency for technical response to emergency events involving oil and hazardous material. The IEPA is also involved with the prevention of environmental emergencies. One means is through implementation of the Illinois Chemical Safety Act, which requires certain industrial facilities to develop and maintain chemical safety contingency plans and conduct periodic training for designated staff that deal with chemical emergency incidents. Another means of prevention is by oversight of comprehensive chemical safety audits that are performed by facilities on chemical process operations. These audits are usually in response to a permit requirement or a court sanctioned consent decree negotiated to resolve a lawsuit filed by the State concerning a spill or release.
 - **Toxic chemical management** - This program deals with toxic chemical risks that do not involve emergency situations. Such risks can result when humans or other living organisms are exposed to chemicals having toxic properties (causing cancer, birth defects, genetic damage, etc.). Managing these risks generally involves five steps:
 1. Awareness that exposures can or do occur;
 2. Assessment of the harm that can result;
 3. Selection of suitable mitigation methods;
 4. Method application to achieve risk reduction; and
 5. Public outreach/education as needed.

A wide range of commercial chemicals or products made with chemicals (e.g., lead-based paint) exhibit these toxic properties. In particular, chemical substances that are regulated under the federal Toxic Substance Control Act and, toxic chemicals subject to reporting under the federal Emergency Planning and Community Right-To Know Act form the core focus for this program. Integration and analysis of toxic chemicals information from other environmental protection programs is also a priority matter.

2. **Program Linkage to Environmental Goals/Objectives** - Over 60,000 chemicals are in commercial use in the United States. Many of the substances have toxic effects on humans and the environment. Unwanted exposure situations can occur in a myriad of ways from transportation accidents to spills at facilities, unsafe removal of hazardous

paints, unsafe removal of mercury containing devices, or bioaccumulation in sport fish that are caught and consumed. This program is designed to reduce excessive risks from toxic chemicals that are present in Illinois. This program also supports the work of media programs that are responsible for achieving clean air, land, and water.

ENVIRONMENTAL GOAL Adverse consequences resulting from toxic chemical releases are avoided, where possible, or otherwise minimized	
<p style="text-align: center;"><u>Environmental Objectives</u></p> <ol style="list-style-type: none"> 1. Toxic chemical hazards will be reduced over the next five years. <p style="text-align: center;"><u>Program Objective</u></p> <ol style="list-style-type: none"> 1. Emergency incidents are timely controlled and fully resolved within 180 days. 2. Lead-based paint is safely removed from exterior surfaces of buildings and structures beginning in 2003. 3. Anglers and their families are timely advised regarding safe fish consumption levels. 4. Annual toxic chemical releases will show a downward trend due to various forces and actions. 5. Acceptable risk-based remediation objectives are achieved for 95 percent of clean-up projects. 	<p style="text-align: center;"><u>Environmental Indicators</u></p> <ul style="list-style-type: none"> • Toxic chemical scorecard (annual amounts released and exposure potential, etc.). <p style="text-align: center;"><u>Program Outcome Measures</u></p> <ul style="list-style-type: none"> • Percents of incidents controlled and fully resolved in specified time. • Percent of removal sites that meet performance standards. • Percent of fish consumption advisories issued within same year that confirmation of problem waters occurs. • Annual amounts (lbs) of reported toxic chemical releases. • Percent of projects with acceptable risk-based remediation objectives.

3. Performance Strategies

- Chemical Emergency Response - Appropriate response to environmental emergencies is among the highest priorities of IEPA and Region 5. Management of that response is conducted within the context of a larger disaster management framework involving all State agencies working with local and federal authorities.
 - a. IEPA will continue to operate a response system that has four principal components.
 1. Duty officers - In order to ensure IEPA capability to assess emergencies on an around-the-clock basis, the Office of Emergency Response (OER) maintains a duty officer system. Each of the five volunteer duty officers are available on-call to the IEMA dispatchers during non-office hours for a week at a time.

- IEPA receives spill notifications on their toll-free hotline on a 24-hour basis and also receives calls during non-office hours. The duty officer evaluates each notification and can contact an on-call OER staffer in each of three offices in the State (DesPlaines, Collinsville, and Springfield) for further technical advice or to request them to respond in person to an incident
2. Core response team - OER has professional staff that work full-time on responding to emergency incidents. This core response team is managed out of Springfield, but also has field staff in DesPlaines and Collinsville. Whenever possible, the IEPA dispatches these specially trained staff to handle emergency situations. This team also gives expert advice to other field operations staff and local officials that may have responded to an incident.
 3. Regional field personnel - Technical staff from the Agency's field offices are distributed in seven regions throughout the State and may be called on to respond to incidents when they either are closest or when individuals have unique technical expertise.
 4. Legal support - The IEPA has provided an attorney and part-time paralegal support of this activity. Various types of viable enforcement cases arise from these emergency situations.
- b. There are several efforts focused on the preventive aspects of emergency management that target one or more of the probable causative areas. The non-random or systemic causes can be reduced by focusing efforts to correct the root cause which may be traced to one or several operational, process design, maintenance or management deficiencies. OER has also begun systematically focusing more efforts recently on compliance efforts involving businesses which frequently report incidents. In the past, this type of approach had been limited to facilities which had very egregious incident histories.
1. Chemical safety activities - Under the Illinois Chemical Safety Act (ICSA), future strategy will be to increase the effectiveness of such plans by conducting a study of "significant releases" that have occurred during the past ten years and communicating the results with the facilities regulated by ICSA. This study will encompass the causes of such releases, the impact of ICSA plans in mitigating releases, and the deficiencies frequently found when plans have been reviewed by IEPA. Efforts will be made to revise the ICSA to more closely parallel and complement the Risk Management Program (40CFR 68) and to include provisions for release prevention.
 2. HAZOP studies- Another approach used by IEPA to address serious releases from technologically complicated process facilities is to require and monitor the conduct of detailed engineering studies of accidental chemical release potential. Such studies usually begin by identifying hazards for various failures in the processes that can result in chemical releases. Often a very detailed and systematic procedure called a Hazards and Operability Study, or HAZOP, is conducted. This approach has been most frequently used by IEPA in an enforcement context as a stipulation of a consent decree. In other situations, such studies have been required as a permit condition.

3. PCB compliance assurance - More inspection work is being focused on facilities that have a greater probability of non-compliance based on experience in other state programs.
 4. Enforcement and compliance assurance tools are used to obtain more prompt and thorough cleanups. Facilities or entities which have a relatively high frequency of spills have also been targeted for increased scrutiny. Examples are anhydrous ammonia releases, oil and fuel pipeline leaks, railroad locomotive spills and spills to surface waters. In addition to assuring objective evidence of remediation, a strategic focus of this effort is to encourage adoption of approaches to reduce the recurrence of these types of incidents.
- c. IEPA has participated in development of area contingency plans for the Upper Mississippi River and the Quad Cities. It continues to participate in area planning for the St. Louis area, and in FY 2000 also began work in the Peoria area.
- Toxic Chemical Management
 - a. Toxics release information (TRI) - IEPA will continue to prepare and publish the Annual Toxic Chemical Report which presents a compilation of toxics data filed (Form R) by specified facilities in Illinois. This information is also made available to and used for other programs and projects.
 - b. Toxics database integration - Our efforts are primarily focused on implementation of the incident management system. This database will be integrated with other priority toxics data. Conversion to an Oracle-based platform has also been undertaken.
 - c. Safe removal of lead-based paint - Focusing on removals from exterior surfaces and superstructures, IEPA will continue to explore a more efficient regulatory scheme that focuses on prevention rather than response to problems. IEPA continues to respond to incidents where lead-based paint gets into the environment due to poor removal practices.
 - d. Statewide fish contamination monitoring - IEPA will continue to participate, as appropriate, on the interagency group. Sport fish are collected each year and tested to determine if consumption is safe or if advisories should be issued.
 - e. Endocrine disruptors strategy - IEPA continues to work on various science and technical issues relating to endocrine disruptors.
 - f. Geographic Initiatives - The IEPA will be part of a geographic focus for multi-media concerns for the following:
 - Participation in the USEPA's St. Louis Gateway initiative and the Greater Chicago initiative.

- Sensitive Receptor Areas - The IEPA received grant funding for a special project to look at environmental hazards in areas around schools. This several-year project is expected to evaluate ways of achieving enhanced protection for children that go to schools in high risk areas.

4. Program Resources

- Chemical Emergency Response - Historically and practically the emphasis has been toward responding to emergencies, assessing the risks the human health and the environment, assisting local responders as appropriate, and assuring appropriate cleanup by the responsible party or with public resources when necessary. About 14 staff are devoted to response, subsequent compliance and enforcement, ICOSA implementation and HAZOP activities. These core staff are funded from non-federal sources. Other field staff that work in the Air, Land or Water Bureaus are funded from a mixture of sources that is addressed in their respective program performance sections.
 - a. PCB Compliance assurance - The work will be performed through the Office of Emergency Response at IEPA. The Agency will devote 1.7 full-time equivalent headcount to inspectional and case development (about 25 inspections and 22 samples) at the anticipated federal funding level of \$100,000. Five personnel will be utilized on a part-time basis each. These staff will do TSCA part-time and emergency response otherwise. IEPA will continue to utilize its Organic Chemistry Laboratory (Springfield) for securing and analysis of samples taken during compliance inspections. The Springfield laboratory has been evaluated and approved for PCB analysis by the USEPA, Region 5 office. Administrative and clerical headcount for inspectional case development will total 0.05 of a full-time equivalent headcount. A State Quality Control Officer will be designated within the Office of Emergency Response to assure that report format and contents are consistent with USEPA standards, and that all suspected violations are properly documented before reports are submitted to USEPA Region 5 for case review and development. Sample analysis quality will be assured by a review process as specified in the previously approved Quality Assurance Project Plan (QAPP). IEPA has submitted a draft update to the QAPP to Region 5 staff in June 2000 and are awaiting comments.
- Toxic Chemical Management
 - a. Toxic chemical release information- This activity is funded entirely from State sources.
 - b. Toxic chemical database integration - First phase supported by federal funds.
 - c. Lead-based paint removal - This activity is currently funded entirely from State sources.
 - d. Endocrine Disruptors Strategy - This activity is funded entirely from State sources.
 - e. Sensitive receptor areas - Federal funding helps support this work.

5. Federal Role

- Emergencies - State emergency management is coordinated with federal capabilities in general through the Federal Response Plan. With respect to the technical aspects of environmental emergencies, state and federal efforts are coordinated in accordance with the Regional Contingency Plan for hazardous materials and with the Oil Pollution Act Area Contingency Plan for oil spills to surface waters. If the USEPA is notified of a release or other incident which might require an emergency response, it will notify the IEPA. The IEPA may request technical and/or enforcement assistance from USEPA if it is unable to adequately respond due to limitations on resources or authority. USEPA will respond if the criteria for a response action in the NCP are met based on manpower availability. USEPA agrees to notify the State of the intent to conduct an emergency response action prior to initiating on-site activities. In cases of extreme emergency, the USEPA will make a reasonable attempt to contact IEPA and will proceed as required to mitigate threats to the environment, public health and welfare.
- Toxic Chemical Management - Region 5 has a Toxics Program Section and a Toxics Reduction team. The Toxics Program Section (in WPTD) includes program activities for PCBs, the Toxic Release Inventory (TRI), and lead (Pb). The Toxic Reduction team is a cross-program/multimedia effort. The team's main activities for FY2000 are to address mercury, endocrine disruptor, lead (Pb), and the Great Lakes Binational Toxics Strategy. Region 5 will take the following actions relating to IEPA's program:
 1. Work with IEPA on identifying facilities for Region 5 TRI data quality reviews in Illinois, as well as other compliance assurance activities.
 2. Provide relevant information about control/regulation of lead-based paint removal.
 3. Continue dialogue with IEPA about strategies for dealing with endocrine disruptors.
 4. The TRI and TSCA Programs will play an advisory role on issues pertaining to EPCRA § 313 and TSCA whenever IEPA requests and address the following:
 - The TRI and TSCA Programs will make sure that IEPA is updated on new regulations, policies, and guidance and Regional initiatives within the State of Illinois.
 - The TRI and TSCA Programs will provide IEPA technical assistance on EPCRA § 313 and TSCA regulations.
 - The TRI and TSCA programs will advise IEPA on EPA National and Region 5 priorities, goals, and enforcement strategies.

6. Oversight Arrangements

- Chemical Emergency Response - No formal arrangement has been used for this program. Coordination occurs through participation in the Region 5 Regional Response Team, of which USEPA is a co-chair. At this time, it does not seem necessary to change the working relationship.

- a. PCB Compliance assurance - Oversight will be minimized for this activity. IEPA has continued to demonstrate sound performance for all aspects of this program.
 - The parties will use the joint planning and evaluation process described in Section I as the principal review procedures.
 - Appropriate inspection reports will be submitted by the IEPA.
 - IEPA will continue to consult with Region 5 to update the QAPP.
- Toxic Chemical Management -
 - a. Toxics release information report - Not applicable since no federal funding is involved.
 - b. Toxics data integration - Based on grant arrangements.
 - c. Lead-based paint removal - Not applicable due to the absence of federal funding.
 - d. Endocrine Disruptors Strategy - Not applicable.
 - e. Sensitive receptor areas - Based on grant arrangements.

E. Innovative Protection Program

1. **Program Description** - This program is comprised of regulatory innovation, pollution prevention and environmental education and assistance.
 - Regulatory Innovation - The IEPA is helping create opportunities for progressive companies and local governments to demonstrate better environmental performance. Specific projects are generated by sponsors that want to try some innovative ways of achieving continuous improvement. In particular, environmental management systems (aka ISO 14001) are often utilized by project sponsors as the driving mechanism.
 - Pollution Prevention (P2) - The IEPA promotes P2 as the preferred strategy for environmental protection. Reducing pollution through the use of less-toxic raw materials, good housekeeping practices and cleaner production techniques is preferable to treating or managing it after the fact. The Office of Pollution Prevention (OPP) promotes P2 through a variety of educational, technical assistance and voluntary recognition programs. For example, OPP sponsors workshops and seminars that inform businesses and others about the latest P2 approaches and management tools. It also employs a staff of engineers and technical specialists that help businesses identify and implement P2 projects at their facilities. Finally, we partner with business associations and environmental groups to provide recognition and support to facilities that adopt comprehensive P2 efforts.
 - Environmental Education and Assistance - The IEPA looks to improve awareness and understanding of environmental issues through education and outreach activities. The Environmental Education Coordinator, working in partnership with non-profit organizations and other governmental agencies, sponsors educational exhibits and contests; conducts teacher-training workshops; provides summer internships for

students; and hosts an interactive Internet site to educate children about environmental protection. The Office of Small Business (OSB) provides resources and assistance to help small businesses comply with environmental regulations through toll-free telephone and online helplines; "plain language" environmental factsheets and guides; speaking engagements at local business organizations and trade associations; and outreach activities and projects.

2. Program Linkage to Environmental Goals/Objectives - Environmental performance at some business and other facilities in Illinois can be positively impacted by non-regulatory influences. This program is designed to help generate environmental progress using practices that are not grounded in the traditional environmental regulatory system. The following goals and objectives reflect this perspective.

ENVIRONMENTAL GOAL

Environmental improvements will result from voluntary actions being taken by businesses, communities, and the public

<u>Environmental Objectives</u>	<u>Environmental Indicators</u>
<p>1. Better environmental performance is demonstrated over the next four years by participants in non-regulatory, structured situations.</p>	<p>Documented performance by participants.</p>
<p><u>Program Objective</u></p>	<p><u>Program Outcome Measures</u></p>
<p>1. Majority of pilot innovation projects undertaken are fully or partially successful (i.e. demonstrates new practices/approaches).</p>	<p>Projects that are undertaken will be evaluated to determine if they are successful, partially successful, or not successful.</p>
<p>2. Facilities accepted for the "National Environmental Achievement Track" (NEAT) (sponsored by USEPA in partnership with states), meet performance expectations for continued participation.</p>	<p>Percent of participating facilities that satisfy criteria for continuing in NEAT each year.</p>
<p>3. More than 50 percent of the facilities receiving assistance from IEPA-trained college intern students are implementing new P2 projects.</p>	<p>Percent of facilities implementing a student P2 project and amount of waste/emissions reduced due to the projects.</p>
<p>4. Effective on-site P2 assistance offered by IEPA non-regulatory engineers and technical specialists increases by 10 percent each year.</p>	<p>Percentage increase in on-site P2 assistance and percent of surveyed respondents implementing at least one recommended P2 project.</p>
<p>5. One or more quality P2 recommendations are provided in 20 percent of the regulatory field inspections by 2003</p>	<p>Percent of field inspections including a P2 recommendation and percent of surveyed respondents implementing at least one recommendation offered by an inspector.</p>
<p>6. More comprehensive facility P2 efforts are generated by 2002 from a revitalized voluntary P2 program sponsored by the Agency.</p>	<p>Percent of participants implementing P2 projects and amount of waste and releases reduced due to the program.</p>
<p>7. Small businesses are making changes or improving performance as a result of IEPA compliance assistance activities.</p>	<p>Percent of surveyed respondents indicating compliance-related changes were implemented as a result of IEPA outreach and assistance.</p>
<p>8. Small business awareness and use of IEPA telephone Helpline increases by 10 percent each year.</p>	<p>Percentage increase in Helpline usage.</p>
<p>9. Environmental awareness, knowledge, and skills are increased for more youth and citizens over the next five years.</p>	<p>Percent of participants in educational efforts who indicate they are better informed on environmental matters.</p>

3. Performance Strategies

- Regulatory Innovation
 - a. EMS agreements - Under State law, we may enter into EMS agreements with cooperating companies or other regulated entities that want to pilot test specific regulatory innovations. We expect to have several companies execute agreements during FY2001 and even more companies initiate the development process.
 - b. XL projects - We have participated in development of facility project agreements for three XL projects so far. Implementation will be taking place during this year.
 - c. National Environmental Achievement Track - We have reviewed and commented on twelve charter participants in this initiative sponsored by USEPA. Additional involvement is expected after participants are confirmed and implementation takes place.

- Pollution Prevention
 - a. Educational Outreach - OPP will sponsor at least three workshops in different areas of the state to promote P2 to non-traditional sectors, such as schools, local governments and water reclamation districts. OPP will update its program display unit and actively seek opportunities to make presentations on P2 topics at businesses, trade associations and educational institutions. OPP will also develop an email distribution list for businesses to more effectively disseminate new developments in P2 techniques and approaches, and continue to update information on its web site.
 - b. Technical Assistance - OPP will provide on-site technical assistance to over 100 facilities to help them identify and implement P2 measures. OPP will recruit, train and place 15-20 student interns at selected Illinois facilities to work on P2 projects during the summer. OPP will also develop a training program for its engineers and technical specialists to incorporate energy efficiency recommendations into facility P2 assessments. Finally, OPP will extend its technical assistance to local government facilities and continue to evaluate the feasibility of creating a P2 grant program for small businesses.
 - c. Regulatory Integration - OPP will work with the media programs to implement at least three targeted initiatives that provide P2 assistance to a specific industrial sector, type of generator or geographic area that can particularly benefit from P2 activities. OPP will continue to provide training to regulatory staff on P2 techniques and practices for selected industrial processes. OPP will work with the BOA and BOW to increase P2 technical assistance during the permitting process. We will also work with the Division of Legal Counsel to expand the role of P2 supplemental environmental projects in enforcement cases.
 - d. Voluntary Initiatives - OPP will complete revisions to the Agency's voluntary P2 program and recruit 100 facilities to participate. OPP will provide technical assistance to facilities participating in the Metal Finishing National Goals Program, Great Printers Project, Drycleaner Star Program and Department of Defense/Illinois P2 Partnership. OPP will also continue to provide P2 and community relations assistance to facilities involved in the Multi-State Workgroup EMS Pilot Project.

- Environmental Education and Assistance -
 - a. Environmental Educator Training - The environmental education coordinator will present teacher workshops for the Illinois EPA's new 5th/6th grade education packet *Environmental Pathways - Youth Investigating Pollution Issues in Illinois*. The Illinois EPA will also co-sponsor at least one professional development training workshop for non-formal educators.
 - b. Education Partnerships - With a limited budget dedicated for environmental education, it is recognized that partnerships provide access to more resources and to a broader audience. Illinois EPA will therefore actively pursue partnerships with external public groups (other state agencies, not-for-profits and USEPA Region 5) and the private sector to develop cooperative environmental education programs.
 - c. Educational Public Outreach - The environmental education committee will continue to expand public outreach efforts to both youth and citizens. The Envirofun captains will be updated and new educational adventures will be installed. New interagency guidelines for the State Fair exhibit will be developed and implemented at the 2001 State Fair. Articles pertaining to current environmental education activities will be submitted to various publications.
 - d. Small Business Helplines - OSB will continue to manage the telephone on-line helplines, which offer small businesses a non-threatening method to obtain answers to environmental regulatory questions. OSB will directly answer routine questions and work closely with Bureau staff to answer technical and complex questions. Efforts to publicize the Helpline will continue.
 - e. Regulatory Guides for Small Businesses - Existing plain language guide for the automotive repair industry will be published in Spanish. It is anticipated that five new guides covering various subjects relevant to small businesses will also be provided.
 - f. Small Automotive Repair Shop Study - Working with the University of Illinois at Chicago, OSB will research both internal and external factors that influence environmental awareness and actions of small repair shops in the Chicago area. A study of the effectiveness of various compliance assistance approaches will be included with the research. The results of this research will assist OSB in developing different approaches to reach small businesses.

4. Program Resources

- Regulatory Innovation - About 1.5 work years are supported by federal and state funding.
- Pollution Prevention - The IEPA will continue to support 12.5 work years with federal funds.
- Education and Assistance -The IEPA will use state funds to support 2.0 work years for education and 3.0 work years for small business assistance.

5. Federal Role

- Regulatory Innovation - Region 5 supports Illinois EPA's efforts to explore alternative approaches that may be more efficient and will enhance environmental protection programs. Region 5 will continue to support and work with Illinois EPA, as needed, on the EMS agreement projects and future EPA/State Agreement to Pursue Regulatory Innovation proposals. Region 5 will coordinate with IL EPA the implementation of the three signed XL Projects in Illinois and will request their participation on any future XL proposal submittals. Region 5 will continue to coordinate with Illinois EPA on Illinois facility applicants to the National Performance Track Program and involve their participation in the development of the program and the 2nd track, Stewardship Track. Illinois EPA is an active member of the Strategic Goals Program (SGP) for Metal Finishing and the Goals Chicago project. Region 5 will continue to work with Illinois EPA on the implementation of the Goals Chicago project and the further development of the SGP.
- Pollution Prevention - Region 5 strongly supports Illinois EPA's efforts to advance pollution prevention activities within the media regulatory programs and to promote the use of pollution prevention within business and communities. Region 5 will continue to provide information on innovative programs, resources and funding opportunities for special projects. USEPA will work with the State to identify methods to track pollution prevention activity outputs and environmental outcomes. In FY 2001, Region 5 will:
 - Continue to chair and facilitate cooperation among stakeholders in the Greater Chicago Pollution Prevention Alliance.
 - Support voluntary sector initiative projects, such as the Great Printers Project and the Strategic Goals Program for Metal Finishers.
 - Chair the Department of Defense/Illinois P2 Partnership.
 - Disseminate pollution prevention information to IEPA, local entities and industries. This will be accomplished mainly through the USEPA supported Pollution Prevention Resource Exchange (P2Rx).
 - Support and promote voluntary programs that reduce pollution at the source, such as the EnergyStar and Waste Wi\$e programs.
 - Share information resources on including pollution prevention projects in compliance and enforcement settlements.
 - Provide training opportunities for environmental staff. This includes support of the National Pollution Prevention Roundtable conference to be held in Chicago in 2001.
 - Leverage activities from the USEPA American Hospital Association MOU to support IEPA's work on mercury reduction in hospitals.
 - Access national efforts such as Environmentally Preferable Purchasing program and Design for Environment program.
- Education/Assistance - Illinois EPA and USEPA will continue to work together on educational conferences and share information on a variety of education topics.

6. **Oversight Arrangements**

- Regulatory Innovation - No specific arrangement other than reporting accomplishments in Annual Performance Report for the PPG.
- Pollution Prevention - No specific arrangement other than reporting accomplishments in Annual Performance Report for the PPG and reporting under any separate pollution prevention grants not covered under the PPG.
- Education/Assistance - There is no oversight arrangement anticipated.

ATTACHMENTS

- \$ Listing of Funding Sources
- \$ Summary Report for FY 2001 PPA Focus Group Discussions
- \$ Listing of Program MOAs and MOUs
- \$ Reporting Requirements Inventory
- \$ Dispute Resolution Process
- \$ Program Outputs

LISTING OF FUNDING SOURCES

- A. The FY 2001 federal performance partnership grant to Illinois EPA includes the following programs for which this agreement serves as the program commitment (e.g., work plan):
1. Air pollution control program (CAA, Sec. 105)
 2. TSCA compliance assurance
 3. Hazardous waste management program
 4. Underground injection control program
 5. Water pollution control program (CWA, Sec., 106)
 6. Public water system supervision program
- B. For the following categorical grants to Illinois EPA, this agreement also serves as the program work plan:
1. CERCLA implementation support (CORE)
 2. Base program funding for nonpoint source control activities (CWA, Sec. 319)
 3. Base program water quality management planning activities (CWA, Sec. 604(b))
 4. State revolving fund administration funding (CWA, Sec. 603 (SDWA, Sec. 1452)
 5. Air pollution program (CAA, Sec. 103))
- C. For the following federal grants to Illinois EPA, this agreement provides an overall strategic framework and, in some cases, implementation provisions that work in concert with the requisite project-specific work plans that remain in effect:
1. TSCA multi-media grant project (Sensitive Receptor Areas)
 2. CERCLA pre-remedial support
 3. CERCLA site-specific projects
 4. Funding for nonpoint source projects (CWA, Sec. 319)
 5. Clean Lakes project funding (CWA, Sec. 314)
 6. Research and demonstration funding (CWA, Sec. 104(b)(3))
 7. Operator training funding (CWA, Sec. 104(g))
 8. Areawide Agency water quality management planning (CWA, Sec. 604(b))

SUMMARY REPORT
FOR FY 2001 PPA FOCUS
GROUP DISCUSSIONS

For the FY 2001 PPA, Illinois EPA and Region 5, USEPA held one focus group discussion session with interested stakeholders. The purpose of this session was to promote public involvement and review of the joint priorities, goals and objectives, and performance strategies. This report presents a summary of the discussions and identifies issues, concerns and suggestions provided by the stakeholders. IEPA and Region 5 responses are also presented for the record.

Public Interests Session

Prior to this session, the participants were sent the 2000 Performance Self-Assessment and the Annual Environmental Conditions Report - 1999. Prairie Rivers Network was the lead group for arranging this session. Eight persons took part in the session held on August 28, 2000 in Chicago. These persons represented six different organizations (see attached roster).

The discussion is summarized as follows:

1. Tom Skinner and Rob Moore made brief opening remarks. In particular, Tom emphasized IEPA's participation in the Governor's strategic planning initiative.
2. Open discussion session - This time we went right into the open discussion without presentations about the major programs.
 - a). Some questions were asked about the current Performance Self-Assessment.
 - (1) What are the intentions for the monitoring strategy workshop for endocrine disruptors (page 3)?
 - (2) What is the status of the mercury collection project (page 3)?
 - (3) IEPA should consider improving coordination with IDNR for critical ecosystems.
 - (4) Is IEPA looking at changing any water use designations? In particular, could we look at North Branch and Chicago River where more recreation is occurring now?
 - (5) What is status of fish sampling?
 - (6) Point was made about regulatory innovation and wanting to work on better incentives for business participation (page 7).
 - Responses:
 - (1) Agency described what's being planned through the FOSTTA for this workshop.
 - (2) Agency stated that the results are available.
 - (3) Agency explained that more coordination has been occurring lately, especially for natural resources damage assessment.
 - (4) Agency explained that we're doing another area first.
 - (5) Agency described fish contaminant monitoring work.
 - (6) Point was noted about need for incentives.

b. Clean Air Program - The following questions or points were raised:

- (1) Has the IEPA been holding back on the ozone regulatory agenda due to all the legal haggling? Couldn't we do the strategic planning work?
- (2) They would like to see more commitment to the CRI in the PPA.
- (3) Several questions and points were made about PM2.5 monitoring and differences in inventories. A request was made for current data.

• Responses:

- (1) Agency stated we have gone ahead with NOx rules in spite of industry reluctance to proceed. We are also open to working with the IEC on SO₂ and old coal power plants.
- (2) Agency is doing a lot of air toxics projects right now, including the Great Lakes work. The Director indicated that BOA should work with these groups as needed. Region 5 stated it is looking to a regional air toxics strategy with the states.
- (3) Agency said data will be sent.
- (4) Agency provided explanation of inventory situation.

c. Update was provided about environmental audit privilege. We have reached agreement with USEPA on the resolution but industry is not on board yet.

d. Waste management - The following questions or points were raised:

- (1) When do we expect to see cleanup of the Savannah Army Depot?
- (2) What is our involvement with the Bartlett balefill?
- (3) They hope we have good permit reviews for HW incinerators.
- (4) Where is the new UIC well and do we plan to phase these out?
- (5) What is the status of the State cleanup program?

• Responses:

- (1) The next funding cycle for the DOD is 2003-4. Congress cut back federal funding and DOD is reprioritizing projects.
- (2) Agency is not a player in the balefill situation.
- (3) No comment necessary.
- (4) Agency explained the location and said there are no plans for phase-out.
- (5) Agency obtained \$50 million in appropriations for cleanup of 33 old landfills that pose a local threat. We also received funding of \$16 million for stabilization of the Paxton Landfill in Chicago.

e. P2 Program - The following questions or points were raised:

- (1) What is the status of the revamping for the P2 Partners? Is it still being piloted by several companies?

(2) Is the Agency using SEPs for P2 loans?

- Responses:

- (1) The schedule has slipped into the late Fall for the announcement of new partners arrangements.
- (2) Agency would need statutory changes for doing loans and this is being considered. We are looking for more outreach to communities on suggestions for resolution of cases.

f. Clean Water Program - The following questions or points were raised:

- (1) They want to see continued commitment to new anti-degradation rules.
- (2) What do we see in monitoring for pesticides, especially in urban areas?
- (3) Why have the NPDES permits for the MWRDGC taken so long to be reissued?
- (4) They would like the Agency to keep the use change for the DesPlaines River and completion of bioassessment protocols in the PPA.
- (5) What is the expected timing for the next 13 watersheds for TMDL development and the two federal lead ones?
- (6) Is implementation linked with the WQM plan?
- (7) Will we consider standards for atrazine?
- (8) They may look at permit fee legislation.
- (9) How will enforcement be handled for stormwater general permits?
- (10) Is IEPA not requiring filing of P2 plans for stormwater permit facilities like Clark Oil?
- (11) How are we handling appeals for narrative standards such as nutrient limits in NPDES permits?
- (12) What are the procedures for evaluation vs. monitoring for permitting on TMDLs?
- (13) What is the approach for nutrient standards?

- Responses:

- (1) Agency indicated that the rules had been signed off and would be filed with the IPCB. We also appreciate the work done by the environmental groups on this rule.
- (2) The pesticide network covers mostly agricultural areas but some screening is done in urban waterways.
- (3) The lengthy delay has stemmed from extensive negotiations with Region 5.
- (4) Their preference was noted.
- (5) The Agency is asking the contractors for generic approaches for nonpoint source dominated areas. Data collection is finished for the Fox River. More federal funding is expected which will help accelerate the TMDL development.
- (6) Yes, we have an on-going coordination process.
- (7) Atrazine is one of the target chemicals we're looking at. Doing this would have a large impact on new permitting.
- (8) ASIWPCA has performed a GAP analysis which might be helpful.

- (9) The Agency has focused mainly on industrial sites. We are checking performance relative to permits. We are checking construction sites on a sample basis and are trying to get local government more involved.
- (10) These plans are not filed with the permits section. The field staff are supposed to check the plans during site visits.
- (11) The Agency described what takes place.
- (12) The Agency explained the way this is handled.
- (13) The Agency stated this was a strategic issue to be addressed during planning.

g. Sensitive receptor area study - Who is doing this project?

- Response - Environmental Policy is doing this work with assistance from the Bureaus. Main focus is on schools.

Business Interests Session

An invitation was extended to these interests. They did not see a need for a dialogue session this year.

Local Government Session

A decision was made not to contact these interests this year, in part, due to extensive scheduling problems experienced last time.

FY2001 PPA Focus Group Discussion
 Public Interest
 August 28, 2000

NAME	REPRESENTING	PHONE NUMBER
Tom Skinner	IEPA	(217) 782-9540
Roger Kanerna	IEPA	(217) 785-5735
Diane Bawley	Citizens for a Better Environ.	312-939-1530
Juanita Hoelscher	CBE	312-939-1530
Robert Mare	Prairie Rivers	217-344-2371
Marian Byrnes	Southeast Env. Task Force	773/374-8543
Albert Ettlinger	Environmental Law & Policy Center	312 795-3707
STACE DARIN	Sierra Club, IL Chapter	312 251 1680
Sarah Olinger	Sierra Club, IL ^{CHAR.} _(intern)	312 251-1680
Kevin Groome	IEPA/PL	217/785-0833
Bill Child	IEPA / BOL (LAND)	(217) 785-9407
CHERYL NEWTON	EPA, Region 5	312-353-6730
Bill Seith	ILL. EPA	217-557-7826
JOSEPH SVOBODA	ILL. EPA	217-782-5544
DAVID KOLAZ	ILL. EPA (BUREAU OF AIR)	217-785-4140
Berrie Kilian	IEPA	217-782-0547
John Perrecone	US EPA	312-353-1149
KEN WESTLAKE	US EPA	312-353-1327
Jason Zotalis	IEPA legislative	312-814-6914
Tim Bortz	US EPA	312-886-1430
Anna Miller	U.S. EPA	312-886-7060
Xenia Marten	ILL. EPA	312-814-7182

MASTER LIST
OF PROGRAM MOA/MOUs

Clean Air Program

1. Illinois Department of Commerce and Community Affairs (DCCA) - This Agreement defines the responsibilities of DCCA and the Illinois EPA in developing and implementing the Small Business Stationary Source Technical and Environmental Compliance Assistance Program which is required under Section 507 of the Clean Air Act.
2. Cook County Department of Environmental Control - This agreement identifies the responsibilities of the County in the implementation of the air monitoring network and filter weights analysis at the Robbins Incinerator.
3. Illinois Department of Commerce and Community Affairs - The agreement identifies small business activities for which DCCA is responsible on an annual basis.
4. Illinois State University - The University will provide population projections to the Agency (Agency intergovernmental agreement split between the Bureaus of Air and Water).
5. Cook County Department of Environmental Control - This agreement identifies the annual activities associated with the installation and operation of the monitoring network and filter weights analysis at Robbins Incinerator.
6. Illinois Department of Agriculture - The annual agreement identifies Stage II inspections at gasoline dispensing stations that will be conducted by the Department.
7. Title V Agreement - The agreement will establish a working arrangement with USEPA regarding the Title V permit program.
8. Transportation Conformity Agreement - The agreement will be negotiated with the Chicago Area Transportation Study and Illinois Department of Transportation regarding the Clean Air Act requirements to ensure transportation-related projects conform to state implementation plan.
9. Compliance Plan - An annual agreement with USEPA to implement compliance and enforcement issues within the context of the enforcement response plan to be finalized with USEPA.
10. Cook County Department of Environmental Control - This agreement defines the responsibilities of Cook County in the implementation of Section 105 Clean Air Act environmental protection programs.
11. Illinois Department of Commerce and Community Affairs - The agreement which identifies the responsibilities of DCCA associated with the Illinois/India Environmental Initiative grant.
12. City of Chicago - This agreement identifies the annual responsibilities of the City in accordance with Section 105 of the Clean Air Act.

Land Program

1. Superfund Memorandum of agreement between the IEPA and USEPA. This agreement establishes procedures to designate "lead agency" and "support agency" roles for all Superfund activities including federal facilities oversight.
2. In 1993 USEPA and IEPA amended the Superfund Memorandum of Agreement. Addendum No. 1 was added. This amendment establishes a collaboration between USEPA and IEPA, which will guide us in dealing with sites which fit the Brownfields definition.
3. In 1995 and 1996 the TACO Memorandum of Understanding was developed under the RCRA Memorandum of Agreement. The amendment is intended to encourage voluntary environmental cleanup, and establish how IEPA intersects with USEPA and to recognize the IEPA use of the Tiered Approach to Corrective Action Objectives for sites subject to RCRA, LUST or the TSCA.
4. RCRA Memorandum of Agreement between IEPA and USEPA. This agreement establishes policies, responsibilities and procedures for the State of Illinois Hazardous Waste Management Program. This MOA further sets forth the manner in which the State and USEPA will coordinate in the State's administration of the State Program and pending State authorization revision.
5. The RCRIS Memorandum of Understanding is designed to ensure that data integrity is preserved, and to provide sufficient data to adequately administer and properly oversee the RCRA program.
6. The Underground Injection Control (UIC) Memorandum of Agreement establishes policies, responsibilities and procedures pursuant to the Safe Drinking Water Act for the State of Illinois UIC program.

Clean Water Program

1. Delegation Agreement with the USEPA for management of the construction grant program under the Clean Water Act.
2. Operating Agreement with the USEPA for management of the Clean Water State Revolving Fund under the Clean Water Act.
3. Operating agreement with the USEPA for management of the Drinking Water State Revolving Fund under the Safe Drinking Water Act.
4. Memorandum of Agreement with the Illinois Department of Agriculture (IDOA) for administration of containment regulations for agricultural facilities.
5. Memorandum of Agreement with the IDOA for the administration of regulations for livestock management facilities and livestock waste handling facilities - pending.
6. Memorandum of Agreement with the Illinois Department of Public Health (IDPH) for regulation of private sewage disposal systems.
7. Delegation Agreement with the USEPA for management of the National Pollutant Discharge Elimination System permit program under the Clean Water Act.
8. Memorandum of Agreement with the IDPH for regulation of non-community public water supplies.
9. Memorandum of Agreement with the IDPH and the Illinois Department of Nuclear Safety (IDNS) regarding laboratory certification authority.
10. Memorandum of Understanding with the IDNS for the agronomic disposal of sludge.

11. Memorandum of Agreement with the IDOA for providing matching funds for Clean Water Act Section 319 grant program.
12. Memorandum of Agreement with the Illinois Department of Natural Resources (IDNR), IDPH, and IDOA for fish contaminant monitoring.
13. Memorandum of Agreement with the City of Chicago for Lake Michigan water quality monitoring.
14. Memorandum of Agreement with the Illinois Department of Transportation (IDOT).
15. Cooperation Working Agreement with IDOA regarding the Agricultural Land Preservation Policy.
16. Memorandum of Agreement with the IDNR regarding capital projects that may affect endangered species.
17. Interagency Agreement with the Historic Preservation Agency regarding permit activities affecting historic sites.
18. Memorandum of Agreement with the Corps of Engineers, IDOT, and IDNR for the dredge and fill program under future 401 and 404 of the Clean Water Act.

Emergency Management

1. Letter of Agreement for Illinois Emergency Operations Plan
2. Agreement for Illinois Plan for Radiological Accidents
3. MOA for Spill Response on the Upper Mississippi River

REPORTING REQUIREMENTS INVENTORY

General Grant Requirements (either grant by grant or combined under PPGs)

Report	Source	Time Frame	Comments
Financial Status Report	40 CFR 31.41 40 CFR 35.6670	Annual, and at termination of grant, unless specified otherwise, but not more frequent than quarterly. Annual reports due 90 days after the end of the grant year. Final reports due 90 days after the grant termination date. Quarterly reports due 30 days after the reporting period.	For PPGs and Non-PPG grants, annual FSRs (and/or 90 days after grant termination) are required, unless quarterly reports are required by special condition to a grant.
MBE/WBE Report	40 CFR 31.36(e) 40 CFR 35.6665	Annual, with the exception of quarterly reports for Superfund cooperative agreements.	Goals are established annually for all grants. Goal attainment reports are required annually, with the exception of quarterly reports for Superfund cooperative agreements.
Proper Inventory	40 CFR 31.50(5)	90 days after grant termination	Only applicable to federally-owned property

Bureau of Air

Reporting and Program Performance Submissions			
REPORT/PERFORMANCE SUBMISSION	SOURCE	TIME FRAME	COMMENTS
PSD draft and final permits	PSD authority; delegation MOU	At notice and at issuance	Submitted in hard copy and electronically in Lotus Notes via the Internet
New Source Review draft and final permits	SIP	At notice and at issuance	Submitted in hard copy and electronically in Lotus Notes via the Internet
Draft and final FESOPs	SIP	At notice and at issuance	Submitted in hard copy and electronically in Lotus Notes via the Internet
Title V draft, proposed, and final permits \$Number of operating permits issued	Program approval	At notice and at issuance Annually	Submitted in hard copy and electronically in Lotus Notes via the Internet End-of-the-Year Grant Report
Title V: Numbers of: <ul style="list-style-type: none"> • New applications \$Significant modifications <ul style="list-style-type: none"> • Early reductions of HAPs By name of source: <ul style="list-style-type: none"> • Significant public interest • Fed. environmental justice concerns • Other than administrative changes • Sources where USEPA has expressed an interest or concern 	MOA	Quarterly	Submitted during periodic telephone conferences with Region 5 staff
Title V source data	Program approval	On-going	Submitted electronically in through the AIRS database
RACT, BACT, and LAER source and control data	PSD authority; delegation MOU	Quarterly	Submitted electronically or in hard copy
MACT source and control data <ul style="list-style-type: none"> • Number implemented • Number of sources affected • Number of sources with operational controls in place 	' 112(l) delegation agreement	During MACT develop- ment and imple- mentation	Submitted electronically via the AIRS database

Air Quality Data: NAMS/SLAMS data already QA/QCed	40 CFR 58	Quarterly	Submitted electronically via the AIRS database; due 3 months following the end of the quarter
Excess Emissions Report Summaries: Facilities= summaries of their excess emissions as detected by CEMS/COMS; send summary of the reports submitted by the sources	Previous NEPPS element	Quarterly	Submitted in hard copy; due 60 days following the end of the quarter
Acid Rain CEMS audits: Selected facilities audited during annual retest \$ Report number of audits performed	Title IV	Upon request; Summary annually Annually	Submitted in hard copy End-of-the-Year Grant Report
Asbestos: List of addresses where inspections were made	Delegation agreement	Quarterly	Submitted electronically via disk; due 30 days following the end of the quarter
Vehicle Emission Test Reports: \$ Number of tests performed \$ Outstanding drivers license suspensions \$ Station utilization rate \$ Wait time statistics \$ Waiver rates \$ Compliance statistics \$ Number and type of motorist telephone calls to hotline \$ QA/QC highlights	At USEPA's request	Monthly	Submitted via hard copy

TOXIC SUBSTANCES CONTROL ACT (TSCA) PROGRAM

REPORT	SOURCE	TIME FRAME	COMMENTS
Written Evaluation Reports	Grant Agreement/40 CFR 31.40	Semi-Annual	Region 5 notes that this replaced by the general, annual end of year report

Bureau of Land

UNDERGROUND INJECTION CONTROL PROGRAM REPORTING REQUIREMENTS			
REPORT	SOURCE	TIME FRAME	COMMENTS
Significant Non-Compliance (Form 7520-2B)	40 CFR 144.8	Semi-annual	15 th of April and October to allow submittal to OECA by the 30 th of each reporting month
Exceptions List <ul style="list-style-type: none"> • Compliance Evaluation • Permit and Area of Review • Inspections/Mechanical Integrity Testing • Non-compliance Report for non-major facilities 	40 CFR 144.8	Quarterly	Form 7520 is not used to report the information to the Region. The information is reported to the region electronically on a quarterly basis. Region V receives the information in a format that enables them to provide the required information to Headquarters. This arrangement has been agreed to by both Illinois and Region V.
Compliance rates with UIC permits, land ban petitions, and enforcement requirements	Management Agreement between Office of Water and USEPA Region 5		Includes those elements not covered under the Form 7520 reporting process. 98 percent is the target rate.

COMMENTS ON USEPA (REGION 5) HAZARDOUS WASTE MANAGEMENT PROGRAM REPORTING REQUIREMENTS			
Report	Source	Time Frame	Comments
RCRA Info Reports	RCRIS Memorandum of Understanding (MOU)	Daily and Monthly	Illinois EPA inputs data and maintains modules for which we are Implementor of Record (IOR). These modules include 1) Compliance Monitoring and Enforcement and 2) Permit. Illinois EPA forwards original Notification of Hazardous Waste Activity Forms (8700-12_ that are received by Illinois EPA to Region 5 into the Corrective Action Module (for which Region 5 is IOR).
Annual Self-Evaluation Report	Environmental Performance Partnership Agreement (EPPA)	Annually (at the end of the year)	This report is a summary of Illinois EPA's activities and performance under the RCRA Subtitle C portion of the EPPA. This report includes summaries of activities and performance under the various

			program initiatives. This report is used for discussion at the end-of-the-year meeting and as a basis for the performance evaluation of Illinois EPA's hazardous waste management program.
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COMMENT ON USEPA (REGION 5) HAZARDOUS WASTE MANAGEMENT PROGRAM REPORTING REQUIREMENTS			
Commercial (off-site) inspection reports.	Federal Commercial Off-Site Policy	Notification of inspection within 24 hours of inspections	The Illinois EPA questions Region 5's need for copies of all inspection reports for commercial facilities. Why are copies needed for facilities that are not in compliance? For facilities that are not in compliance, the necessary information can be obtained from RCRIS. Why doesn't the 24-hour notification satisfy Region 5's need for information?

Training reports and FOIA reports will be provided to Region 5 upon request. All other reports previously identified on Region 5's reporting list for the hazardous waste management program should be eliminated from consideration and no further mention of those reports is necessary. In fact, no further mention of the Commercial (Off-Site) Inspection Reports is needed once the issue is resolved.

SUPERFUND COOPERATIVE AGREEMENT PROGRAM REPORTING REQUIREMENTS

Report	Source	Time Frame	Comments
Quarterly Reporting	40 CFR 35.6650	Original requirement -- 30 days after Federal fiscal quarter. Approved deviation allows semi-annual.	Region 5 has received a deviation to move to semi-annual reporting. This applies to all States.
DOL Report Davis-Bacon Act	40 CFR 35.6665	Within 10 days of construction award.	Construction contracts only.
NTC Removals started	Section III-H of the USEPA Region V - Illinois EPA Superfund Memorandum of Agreement (SMOA)	Semi-annual	This requirement (and those that follow) may be met by a commitment to maintain the CERCLIS III data base. Once this data base is running for state data entry, Region 5 will consider requests to modify these reporting requirements to address this change.
Number of PAs/SIs	Section III-A of the SMOA	Semi-annual	Same as above.
RI/FS, RD and RA starts	Sections III-B, III-D, III-E of the SMOA	Semi-annual	Same as above.
RODs signed	Section III-C of the SMOA	Semi-annual	Same as above.
Construction Completions	Section III-E of the SMOA	Semi-annual	Same as above.
Enforcement Negotiations started	Section IV-C of the SMOA	Semi-annual	Same as above.
Settlements reached	Section III-C of the SMOA	Semi-annual	Same as above.

UNDERGROUND STORAGE TANK (UST) PROGRAM REPORTING REQUIREMENTS

Report	Source	Time Frame	Comments
Written evaluation reports	Grant Agreement/ 40 CFR 31.40	Semi-annual	Region 5 notes this is replaced by the end-of-year reports/self-assessments for EnPPA, PPG states.
Performance Measures Report	Grant Agreement	Semi-annual	Region 5 recognizes this as a "bean report," and will promote changes at the national level; however, until such time, a semi-annual report is still required.

**LEAKING UNDERGROUND STORAGE TANK (LUST)
PROGRAM REPORTING REQUIREMENTS**

Report	Source	Time Frame	Comments
Financial Status Report	Grant Agreement/ 40 CFR 30.52	Semi-annual for Illinois	Due to continued concerns related to spending, Region 5 requests semi-annual FSRs for this program from Illinois, reduced from quarterly.
Performance Measures Report	Headquarters	Semi-annual	Region 5 recognizes this as a "bean report," and will promote changes at the national level; however, until such time, a semi-annual report is still required.

Bureau of Water

Report	Source	Timeframe	Comments
SAFE DRINKING WATER ACT			
Safe Drinking Water Program			
Safe Drinking Water Information System (SDWIS) Note: This is a data input requirement	40CFR 142.15	Quarterly	Database reporting that includes: PWS Inventory, Violations, Enforcement, Variance/Exemption
Annual Compliance Report (ACR)	SDWA amend. 1414(c)(3)(A)(I)	Annual	State distributes the report to the public. USEPA takes all of the State's annual reports and publishes a national report.
Annual Guidance requirements. The program guidance is incorporated by reference in the EnPPA. See Program description b, and oversight Arrangements b.	40 CFR 142.17	Annual	At least annual USEPA shall review the compliance of the State set forth in 40 CFR part 142, subpart B and the approved State primacy program.
Source Water Assessment Program Set Aside Report	Program Directive SDWA Section 1453	Annual	SWP Set-aside.
Wellhead Protection Program			
Wellhead Protection Status Report	SDWA 1428(g)	Biennial	Status report describing the State's progress in implementing the Wellhead Protection Program. Include amendments to the State program for water wells sited during the biennial period.

CLEAN WATER ACT

Watersheds and Nonpoint Source and Standards and Applied Sciences

Report	Source	Timeframe	Comments
305(b) Water Quality Report	40 CFR 130.8 and 130.10	Written report in even numbered years (e.g., 2002, 2004) and an electronic update of water quality data in odd numbered years (e.g., 2001, 2003)	Serves as the primary assessment of state water quality; leads to development of water quality management plans. Serves as the annual water quality report under 205(j). In even numbered years, draft report is due January 1; final report due April 1. In odd numbered years, electronic updates due April 1.
Section 205(j) certification	40 CFR 130.10	Annual	Will be replaced by the 305(b) report.
STORET/Ambient water quality monitoring (Note: This is a data base input requirement)		90 days	The State is required to store ambient water quality data in a suitable database, and eventually (within 90 days) transfer the data to STORET.
303(b) (d)List	130.7(d) 130.0	Biennial, due April 1 of even numbered years. Due April 1 of every fourth year, beginning in 2002.	Consists of a list of waters, pollutants causing impairments, and the priority ranking including waters targeted for TMDL development.

National PCS Data base - All of the following relate to the Permit Compliance System (PCS) Update for Enforcement and Compliance and NPDES (Permitting) Programs as required by the PCS Policy Statement, Water Enforcement National Data Base (WENDB) and cited Regulations. They are data base inputs unless otherwise indicated. (Ongoing with timeframes as indicated).

Enforcement and Compliance Assurance			
Report	Source	Timeframe	Comments
Commitments Pre-treatment and Sludge Programs	Federal Rule Part 503 and 40 CFR Part 403 respectively	Data entry of Annual Reports from Municipalities with approved P/T programs	Federal Rule Part 503 sets minimum national standards.
		Quarterly entry of inspection data for categorical and significant industrial users	Update to Pretreatment Program Enforcement Tracking System (PPETS) for all approved pre-treatment programs
		Quarterly Report	Pre-treatment SNC for all major approved programs
Violation/enforcement/penalty data, which includes compliance schedules and their updates.	40 CFR 123.27	Ongoing in PCS manual reporting - semi-annual.	Administrative Orders Consent Orders Judicial Cases with Penalties concluded
Inspections	40 CFR 123.26	As conducted	USEPA reports State and Federal field efforts semi-annually to HQ.
NPDES (Permitting) Support			
Report	Source	Timeframe	Comments
Inventory data for major and minor dischargers	PCS QNCR/Moving Base Memorandum of Agreement (MOA)	Ongoing Quarterly to Region	State submits list of major dischargers annually as required in MOA. Updates of the major and minor dischargers are in PCS.
Permit limits	PCS, 40 CFR 122.44	Issuance/renewal/modification	All permits are required to have effluent limitations as specified in regulation. No specific reporting requirement.
Permit Issuance and Expiration dates	PCS, 40 CFR 122.46	Ongoing	Each permit is required to have specified duration.
Effluent monitoring	PCS/DMR data	Ongoing, whether	As required by regulation, and

data	40 CFR 122.48	monthly, weekly, daily, grab, composite, etc.	permit specification.
Compliance schedules	PCS, 40 CFR 122.47	Varies-based on permit requirement	Permittees are required to submit progress reports if any compliance schedules are included in its permit. State reports status in PCS.

Assistance Agreements/Grants

Water Project/Grant Progress and Performance Reports, including 104, 106, 205(j),* and 319	Grant Requirement 40 CFR 31.40 319's source is CWA 319(h)(11)	End of Grant or Budget/Project Period	Water Programs have numerous pots of moneys which are all covered by an end of grant, end of project reporting requirements (as noted under general grant requirements). When part of an EnPPA/PPG, these are combined with an overall end-of-year report; otherwise a separate report is provided. In general, all reporting has been reduced to annual or end of project.
*Semi-annual		319 - Annual	
Drinking Water/Clean Water SRF measures	Office of Water Core Performance Measures SDWA 452	Annual	Outlays Other core measures

Great Lakes Program Office

Great Lakes Projects (Funded under Section 104) Progress Reports	40 CFR 31.40	Quarterly, Semi-annually, or annually, as determined by Program	Varies by project. Periodic progress reports and a final report are required.
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DISPUTE RESOLUTION PROCESS

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

A. Informal Dispute Resolution Guiding Principles

IEPA and Region 5 will ensure that program operations:

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

B. Formal Conflict Resolution

There are formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 40 CFR 31.70 outlines the formal grant dispute procedures. There is also an NPDES conflict resolution procedure. The Superfund Program sponsors an Alternate Dispute Resolution Contract that provides neutral third parties to facilitate conflict resolution for projects accepted into the program. These are all time-consuming and should be reserved for the most contentious of issues. For less contentious matters, we will use the following procedures:

1. Define dispute - any disagreement over an issue that prevents a matter from going forward.
2. Resolution process - a process whereby the parties move from disagreement to agreement over an issue.
3. Principle - all disputes should be resolved at the front line or staff level.
4. Time frame - generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. If unresolved at the end of two weeks, the issue should be raised to the next level of each organization.
5. Escalation - when there is no resolution and the two weeks have passed, there should be comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

BUREAU OF AIR PROGRAM OUTPUTS

Ozone:

1. Identification, measurement, and quantification of program support for Partners for Clean Air (March 2001)
2. Submittal of final rules to complete the attainment demonstration for the Metro-East nonattainment area (December 2000)
3. Submittal of the complete attainment demonstration for the Chicago nonattainment area (December 2000)
4. Submittal of final rules to implement the NO_x SIP call for EGUs (December 2000) and for non-EGUs and cement kilns (February 2001)
5. Submittal of triennial ozone precursor inventory for ozone nonattainment areas in NET format by June 2001
6. Submittal of statewide inventory major point sources of ozone precursors in NET format by June 2001

Title V:

7. Issue Title V permits to electric utilities
8. Issue construction permits; PSD and New Source Review evaluations as necessary
9. Submit revised Title V program to USEPA for full approval (June 2001)
10. Provide draft/proposed permits to Region 5 for review concurrently with public notice and review
11. Submit data to the RACT/BACT Clearinghouse

Air Toxics:

12. Continue implementation of § 112, including subsections (g)(major HAPs New Source Review), (f)(residual risk), (i)(construction permits), (j)(site-specific MACT where USEPA has not promulgated categorical MACT), and (r)(release management plans)
13. Continue general air toxics air quality data collection and submittal to AIRS
14. Operate two toxics monitoring sites through December 2000
15. Continue PAMS monitoring at four sites on the PAMS schedule
16. Continue data collection for the O'Hare air toxics monitoring project through December 2000; analyze data in partnership with Region 5; submit data to AIRS
17. Urban Toxics Strategy: evaluate impact on Illinois source sectors; evaluate federal/state roles; determine the significance of sectors not affected by MACT standards; work with sources or groups of sources towards gaining reductions of toxics emissions or further risk assessment.
18. Great Lakes Project: continue to enhance inventory development; contribute to development of the regional strategy.
19. Implement mercury monitoring subsequent to receipt of federal funding
20. Continue to refine Illinois' statewide inventory as part of the National Air Toxics Assessment
21. Submit draft 1999 inventory in NET format for 188 HAPs by June 2001

22. Develop 1999 database modeling parameters.
23. Finish review of CRI chapters; provide discussion and narrative on state activities for the CRI report

Compliance:

24. Compliance investigations and enforcement actions that provide an acceptable balance between resource commitments (state, local, federal) and benefit to the environment, including any SEPs
25. Implement the FY01 Compliance Workplan
26. Develop a process for annual systems performance review for ERMS (May 2001)
27. Complete ERMS annual systems performance review

Base Programs and National/Regional Priorities:

Air Monitoring:

28. See Reporting, below
29. Perform CEMS audits, particularly of SO₂ emissions at utilities
30. Continue deployment of the PM_{2.5} chemical speciation monitoring network; collect and analyze data

State Permitting:

31. Provide USEPA with copies of construction permits, as appropriate

PM_{2.5}:

32. Continue inventory development
33. Continue collection of monitoring data

Data Management:

34. Complete implementation of the ERMS application and the evaluation of its first year of operation (by March 1, 2001)
35. Revise the Annual Emissions Report rule to encompass special ERMS reporting as well as other changes in reporting requirements
36. Prepare an updated Conceptual Design for the ICEMAN system
37. Complete the General Design for ACES and begin implementation (by March 1, 2001)

Community Relations:

38. Hold public hearings as appropriate
39. Prepare and disseminate responsiveness summaries following public hearings and receipt of comments
40. Prepare and disseminate fact sheets, pamphlets, and news releases as appropriate

Multi-Media Agency Programs:

41. Develop a regulatory approach to limiting particulate emissions of lead from external surface removal projects

National/Regional Priorities:

(Note: These activities are included within our categorical activities listed above.)

Reporting and Program Submissions:

42. Illinois EPA Bureau of Air will provide USEPA with the reports and program documents as listed in the Reporting Requirements Inventory.

Bureau of Land Program Outputs for FFY 2001

Division of Land Pollution Control

Hazardous Waste Management

1. Number of treatment storage disposal facilities inspections
2. Number of enforcement actions taken and penalties collected
3. Number of compliance surveys conducted
4. Number of compliance agreements established
5. Number of criminal investigations initiated and closed
6. Number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases)
7. Number of draft and final permits and permit modifications issued to facilities in the permitting universe
8. Number of closure plans, closure plan modification requests, and closure certifications reviewed and approved for facilities
9. Number of RCRA Facility Assessments completions, stabilization actions required in a permit, RCRA Facility Investigation Phase I and Phase II report or workplan approvals, and corrective measure report approvals. NOTE: among these corrective measure reports will be a final remedy construction completion report

(Nonhazardous) Solid Waste Management

1. Number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (nonhazardous waste cases)
2. Number and category of Used Waste Tire facilities inspected
3. Number of tire cleanups conducted and volume of tires recycled
4. Number of Closure Certifications approved for non-hazardous landfills

Division of Remediation Management

Federal Cleanups

1. Number of Remedial Investigation Reports reviewed annually
2. Number of Findings of Suitability for Transfer reviewed annually
3. Number of engineer evaluation/cost analyses reviewed annually
4. Number of Brownfield Assessment reports completed annually
5. Number of new CERCLA sites (i.e., National Priorities List sites, Federal facilities, or other hazardous waste sites) identified annually
6. Number of CERCLA sites where removal actions (i.e., short-term actions) have been initiated
7. Number of CERCLA sites where remedial actions (i.e., constructions aimed at permanent remedies) have been initiated

8. Number of Record of Decisions have been signed
9. Number of CERCLA investigations initiated

State Cleanups

1. Effective date of amendments to Site Remediation Program regulations
2. Number of new Site Remediation Program sites enrolled annually
3. Number of new Response Action Program sites identified annually

Leaking Underground Storage Tank (LUST) Cleanups

1. Effective date of MtBE amendments to land regulations
2. Enactment of legislation to extend Environmental Impact Fee
3. Number of new state and federally regulated LUST sites (i.e., incidents) identified annually
4. Annual average cost of cleanup per site (based on payments from the UST Fund)

Brownfields

1. Applications received annually for Brownfield loans
2. Number of Brownfield loans (and dollar value) issued annually
3. Number of Brownfield grants (and dollar value) issued to communities to investigate and assess contamination annually
4. Number of Brownfield assessments conducted by Illinois EPA annually

Cross-Bureau

Co

Community Relations

1. Number and description of public hearings arranged or coordinated by the Office of Community Relations for LUST, RCRA, Superfund and other Bureau of Land programs annually
2. Number and description of responsiveness summaries written by the Office of Community Relations for LUST, RCRA, Superfund and other Bureau of Land programs annually
3. Number and description of fact sheets, pamphlets, and news releases written by the Office of Community Relations for LUST, RCRA, Superfund and other Bureau of Land programs annually.
4. Number and description of events (e.g., property access, sampling, surveys, meetings) that the Office of Community Relations staff assists Bureau of Land staff (or their representatives) for LUST, RCRA, Superfund and other Bureau of Land programs annually.
5. Number of media inquiries and/or events handled by the Office of Community Relations (in conjunction with the Office of Public Information) for LUST, RCRA, Superfund and other Bureau of Land programs annually.
6. Number of permit/remedial applicants and responsible parties assisted annually by the Office of Community Relations in meeting their public involvement obligations (e.g., reviewing community relations plans and other materials, arranging facility tours, facilitating site open houses, hosting availability sessions).

Program Outputs

Bureau of Water

Point Source Control

Watershed Management

1. Description of major achievements in developing and implementing comprehensive watershed management programs including how water quality standards are used in managing water quality improvements and how interrelated programs will be coordinated using a watershed approach. (Source: End-of-year report)
2. Develop Watershed Implementation Plans on the 104(b)(3) funded planning grants.
3. Number of water quality surveys (Source: End-of-year report)
4. Designate up to 85 dedicated Nature Preserves as Class III Special Resource Groundwater to the Illinois Pollution Control Board.
5. Summary information on reduction in pollutant loading from point sources in priority targeted watershed. (Source: End-of-year report)
6. Number of facility inspections conducted. (Source: PCS)
7. Number and percentage of approved pre-treatment facilities audited in the reporting year. Of those, the number of audits finding significant shortcomings and the number of local programs upgraded to achieve compliance. (Source: PCS)
8. Percent of POTWs that are beneficially reusing all or part of their biosolids. (Source: End-of-year report)
9. List of actions taken to reduce NPDES compliance monitoring (Source: End-of-year report)
10. Status of all delegated NPDES programs with regard to adoption of applicable regulations and legal requirements (Source: End-of-year report)
11. Number of CAFOs with 1,000 or more animal units with current permits and whether the permits include manure management requirements.
12. TMDL status: a) the number of TMDLs submitted to EPA; b) the number of state-established TMDLs approved by EPA. (Source: End-of-year report)

Nonpoint Source

13. Identify those watershed projects in the Section 319 draft work plan which are included in the Unified Watershed Approach. Identify the watersheds priority ranking within the Illinois EPA's Targeted Watershed Approach.
14. IEPA to cooperate with Department of Agriculture on refining Transect Survey data and establish degree of error in computation of erosion from cropland.

Public Involvement

15. Public involvement into the Watershed Initiative will be described as part of the watershed report identified in Program Output #1 of Watershed Management (Source: End-of-year report)

Drinking Water Program

16. Status of significant activities taken to meet new SDWA requirements including:

- The State must provide documentation to USEPA showing the ongoing implementation of both the new systems capacity development program and the existing systems capacity development strategy. (Report due by August 6, 2001.)
- Submit a report to USEPA on the success of its capacity development strategy in helping systems with a history of significant non-compliance improve their capacity (report should be based on the 1997 and 2000 SNC list submittal by the State). (Report due by August 6, 2001.)
- Section 1414(c)(3)(A) annual compliance report.
- Percent of DW-SRF set-aside funds earmarked to perform source water delineations and assessments. (Source: End-of-year report)
- Develop modifications to the Public Notice Regulations and Lead and Copper Minor Revisions Regulations.
- Implement a return to compliance program when the Radionuclides Regulations are in "final" form. (Source: End-of-year report)
- Initiate annual Operator Certification Program submission.

Source Water Protection

17. Continue publication of source water assessments for community water supplies.
18. Continue work to include source water protection provisions into the WIP guidance and participate in watershed efforts (including Lake Michigan LaMP, Upper Mississippi, etc.) to protect surface water supplies of drinking water.
19. Continue to propose regulated recharge areas and maximum setback zone regulations to the Illinois Pollution Control Board.

Lake Management

20. Initiate and administer 1-3 Phase I diagnostic-feasibility studies and 3-5 Phase II implementation projects under the Illinois Clean Lakes Program.
21. Initiate and administer four to six projects under the Priority Lake and Watershed Implementation Program.
22. Conduct Ambient Lake Monitoring Program activities at 50 lakes.
23. Conduct basic Volunteer Lake Monitoring Program (VLMP) Secchi transparency and Zebra Mussel monitoring at 180 lakes. Conduct expanded VLMP monitoring (i.e., Chlorophyll a, Water Quality) at 100 lakes.
24. Continue expanded technical assistance capabilities to lake associations, volunteers, lake owners/managers, and the public.
25. Provide funding for and administer approximately 100 Lake Education Assistance Program Grants.
26. Plan for and conduct five lake management workshops in different parts of the state.
27. Develop and distribute four to six Lake Notes fact sheets.

Small System Support

- 28. Number of operational visits conducted. (Source: End-of-year report)
- 29. Estimate of water supply personnel informed/trained. (Source: End-of-year report)

State Revolving Fund

- 30. Number of communities receiving loans and the amount. (Source: End-of-year report)
- 31. Report on federal indicators to measure the pace of the CW-SRF and DW-SRF programs. (Source: End-of-year report)
- 32. Continue to maintain SRF information system. (Source: End-of-year report)

Technical and Public Education

- 33. Technical assistance workshops presented with Illinois Rural Water Association, Illinois Section AWWA, IDPH, IPWSOA and local operator groups.

NPDES Program Delegation

- 34. Development of regulatory package to allow the assumption of sludge authority for presentation to Pollution Control Board and Agency rulemaking procedures.
- 35. Pre-treatment effectiveness report. (Source: End-of-year report)

NPDES Permit Backlog

- 36. Substantial elimination of the backlog of expired NPDES permits for facilities that have been identified as significant contributors to water quality problems in priority watersheds by the end of the fiscal year.
- 37. Number of stormwater sources associated with industrial activity, number of construction sites over five acres, and number of designated stormwater sources (including Municipal Phase I) that are covered by a current individual or general NPDES permit. (Source: PCS)
- 38. Number of permittees that are covered by NPDES permits or other enforceable mechanisms consistent with the 1994 CSO policy. (Source: PCS)
- 39. Number of a) non-storm water general permits issued and b) number of facilities covered. (Source: PCS)

Compliance Assistance/Enforcement

- 40. Average number of days to reach agreement on a compliance plan for resolution of violations. (Source: PCS)
- 41. Success ratio for participants that receive compliance assistance. (Source: PCS)
- 42. Description of environmental benefits that are achieved due to resolution of enforcement cases that involve P₂ and SEPs. (Source: End-of-year report)
- 43. A pilot assessment annual compliance excellence achievers as demonstrated by three or more years of sustained compliance. (Source: PCS)

44. Percent of discharge monitoring data received that is required to be reported by the NPDES permit program. (Source: PCS)
45. Yearly significant non-compliance days per NPDES major discharger.
46. Number of enforcement actions including number of non-compliance advisories issued. (Source: PCS)
47. Number of cases involving audit privilege. (Source: End-of-year report)
48. Enhancement of Enforcement Management System reflecting provisions of recent legislative changes and program priorities. (Source: End-of-year report)
49. Number of demand letters issued. (Source: End-of-year report)
50. Number of wastewater and water supply operators certified. (Source: End-of-year report).
51. Percent of sample results received that are required under the SDWA. (Source: SDWIS)
52. Report to address Office of Enforcement and Compliance Assistance Accountability Outcome Measures #2 and #3:
 - Environmental and public health benefits achieved through inspections and enforcement activities.
 - Results or impact of using: audit privilege or immunity law; audit policies; small business compliance assistance policies; and compliance assistance initiatives developed for specific industrial sectors. (Source: End-of-year report)

Inspection Strategy

53. Inspection Strategy at the start of the fiscal year identifying overall goals and priorities including an approach for targeting CAFOs.
54. Inspection Plan at start of fiscal year identifying facilities to be inspected and type of inspection to be conducted. Includes Majors, Pre-treatment Communities. (Source: PCS)

Water Quality Standards

55. Specific outputs for biocriteria, water quality standards, GLI, nutrients and use designations as identified in the FY 2000 Performance Partnership Agreement.

Total Maximum Daily Load (TMDL)

56. Develop TMDLs in accordance with the approved schedule.
57. Complete development of TMDLs on the 7 watersheds identified on the Illinois EPA's 1998 303(d) list for completion and submittal to USEPA for approval by July 2001.
58. Begin development of TMDLs on 13 watersheds in accordance with the long-term schedule identified in Illinois EPA's 1998 303(d) list.

Review of National Data/Reporting Systems

59. Report proposing changes in reporting and format for the next self-assessment. (Source: Report by the end of the second quarter of the federal fiscal year)

Monitoring and Assessment

60. Percent of state waters monitored and assessed as Good, Fair, or Poor (includes waterway, inland lake, and Lake Michigan). (Source: Annual supplement to 305(b) report)
61. Percent of river miles and lake acres that have been assessed for the need for fish consumption advisories; and compilation of Site-issued fish consumption advisory methodologies. (Source: Annual supplement to 305(b) report)
62. Finalize development of the new Index of Biotic Integrity (IBI) for fish and document in a published report.
63. Conduct a pilot study to provide additional data for macroinvertebrate biotic index metric and sampling techniques development.
64. Develop a comprehensive draft report that documents the Agency's updated Surface Water Monitoring Strategy for 2002-2006.
65. Complete analysis of new Agency and USEPA collected data from the three Section 303(d) listed stream segments on the Fox River.

Community Relations

66. Number of and description of public hearing and meetings arranged for or coordinated by the Office of Community Relations for permits, planning, and other Bureau of Water programs annually.
67. Number and description of responsiveness summaries coordinated by the Office of Community Relations for permits, planning, and other Bureau of Water programs annually.
68. Number and description of fact sheets, pamphlets, and news releases written by the Office of Community Relations for permits, planning, and other Bureau of Water programs annually.
69. Number and description of events (e.g., conferences/workshops, property access agreements, field sampling activities, surveys, project meetings) that the Office of Community Relations staff assists Bureau of Water staff (or their representatives) with for permits, planning, and other Bureau of Water programs annually.
70. Number of media inquiries and/or events handled by the Office of Community Relations (in conjunction with the Office of Public Information) for permits, planning, and other Bureau of Water programs annually.
71. Number and description of miscellaneous activities and events handled annually by the Office of Community Relations in supporting the Bureau's public involvement needs (e.g., reviewing community relations/outreach materials, arranging facility tours, facilitating site/project open houses, hosting availability sessions).

MULTI-MEDIA PROGRAMS PROGRAM OUTPUTS

Toxic Chemical Management Program

- Toxic Chemical Management
 1. Annual Toxic Chemical Report.
 2. Number of PCB inspections, related sample results and inspection reports.
 3. Preparation of enforcement cases, if applicable.
 4. Decision about regulatory proposal.
 5. Number of removal incidents where response is necessary.

- Chemical Emergency Response
 1. Number of emergency incident notifications and IEPA on-site responses.
 2. Number of significant release reviews conducted and recommendations sent to IEMA.
 3. Number of HAZOPS.
 4. Number of enforcement actions taken.

Innovative Protection Program

- Regulatory Innovation
 1. Number of regulatory innovation projects that are proposed and are implemented.
 2. Number of clients that receive some assistance.
 3. Number of small business guides that are completed.

- Pollution Prevention

(Education Outreach)

1. Number of presentations completed.
2. Number of attendees at P2 workshops.
3. Number of requests for further assistance from presentations and workshops.
4. Number of participants on e-mail distribution list.
5. Number of documents and links available on OPP Web page and number of time pages are accessed ("hits").
6. Sponsor special P2 seminars for local governments.
7. Level of customer satisfaction with educational outreach activities (ease of use, contains useful information, clear format, etc.).

(Technical Assistance)

1. Number of P2 site visits conducted.
2. Number of facilities reached through special outreach initiatives.
3. Number of engineering interns placed with business and others.
4. Number of P2 recommendations offered.
5. Project/Actual amount of pollution prevention.
6. Level of customer satisfaction.

(Regulatory Integration)

1. Number of facilities receiving on-site technical assistance as a result of an inspection.
2. Number of geographic or sector initiatives with P2 element.
3. Number or percent of non-compliance actions (compliance-commitment agreements, consent decrees) which include P2 recommendations or conditions.
4. Number of inspections where P2 was discussed.
5. Develop and initiate P2 training for selected permit writers.
6. Provide follow-up sector-specific P2 training for field staff.

(Voluntary Initiatives)

1. Initiate new voluntary P2 program for Illinois businesses.
2. Initiate special mercury reduction recognition program for hospitals.
3. Number of participants in voluntary P2 initiatives and partnerships.
4. Number of P2 projects implemented by program participants and amount of pollution prevented.
5. Level of P2 integration into facility business functions.

- Environmental Education

(Support increased intra-Agency coordination of environmental education)

1. Quarterly Environmental Education reports for Senior staff.

(Refine suitable environmental indicator(s) and core performance measure(s))

1. Annual number of persons who participate in environmental education activities
2. Summary reports of pre- and post-survey results.

(Develop partnerships with external groups)

1. Number of partnerships formed.

(Expand public outreach)

1. Revised *Air, Land & Water* education packet.
2. Teacher workshops for the revised *Air, Land & Water* education packet.
3. Exhibit to promote the Illinois EPA's environmental education program.
4. Revised conceptual design plan for Illinois EPA's environmental education Web site.
5. Next edition of Envirofun installed.
6. Number of environmental education articles for various publications.