

FY2012/2013 PERFORMANCE  
PARTNERSHIP AGREEMENT  
BETWEEN  
ILLINOIS EPA AND REGION 5, USEPA

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

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

Entered into on this 17<sup>th</sup> day of October 2011



Lisa Bennett  
Interim Director



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Regional Administrator

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

The Federal Fiscal Year 2012/2013 (FY12/13) Performance Partnership Agreement (Agreement) sets forth the mutual understandings reached regarding our state/federal relationship, and identifies the desirable environmental outcomes and performance expectations for the programs funded through the Performance Partnership Grant for the period of October 1, 2011 through September 30, 2013. The parties to this agreement are the Illinois Environmental Protection Agency (Illinois EPA) and Region 5 of the United States Environmental Protection Agency (Region 5). Illinois EPA and Region 5 entered into a separate Illinois Work Plan Agreement, dated February 24, 2011. This agreement contains references to that Work Plan, but does not supersede it.

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

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

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

Illinois EPA will operate under a Performance Partnership Grant (PPG) in FY2012/2013. The FY12/13 PPA implements a new format to integrate USEPA Strategic Plan Goals and Objectives into the PPA document and to provide a more user friendly template. The templates attached to this agreement serve as specific work plans for the grants included in the Illinois PPG. The templates contain the three Essential Elements required by Grants Policy Issuance 11-03, and will also be used to report accomplishments on an annual basis. The measures and commitments in the work plans will be reviewed and updated as needed on an annual basis.

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

The parties also recognize that some specific project grants will continue in effect and operate in concert with this Agreement. The FY12/13 federal Performance Partnership Grant to Illinois EPA includes the following programs for which this agreement serves as the program commitment:

1. Air pollution control program (CAA, Sec. 105)
2. TSCA compliance assurance
3. Hazardous waste management program
4. Underground injection control program
5. Water pollution control program (CWA, Sec. 106)
6. Public water system supervision program
7. Nonpoint source pollution control program (CWA, Sec. 319) (TMDL)

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

1. Title V permitting and compliance activities under the Clean Air Act amendments.
2. Midwest Clean Diesel Initiative

In past agreements a separate section entitled Joint Environmental Priorities has been included to highlight and focus attention and resources to mutually concerned areas of interest. Joint Environmental Priorities did not receive additional funding. Joint Environmental Priorities continue to be areas of highlighted concern. Therefore Joint Environmental Priorities have been incorporated into the individual bureau workplans.

Congress requires USEPA to negotiate a fair share objective with each state for procurement dollars covering supplies, construction, equipment and services. The current negotiated rates require, to the fullest extent possible, that at least 18 percent of federal funding for prime and subcontracts awarded in support of 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. 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.

**C. 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, a two-year agreement covering FY12/13.

<u>Actions</u>	<u>FY2012</u>	<u>FY2013</u>
Finalize FY12/13 Agreement	September 2011	
Senior Management Mid-Course Meeting	July 2012	
Mid-Course Updates	September 2012	
Illinois EPA Annual Performance Partnership Grant Report	December 2012	December 2013
Region 5 Evaluation of Annual Performance Partnership Grant Report	February 2013	February 2014

Throughout this agreement and in the attached documents, the timeframe is throughout FY2012/2013, unless specific timing/milestones are otherwise noted.

The Annual Performance Report for the PPG is a key component of the performance review. In addition, each media office has a documented post award management process, which they will continue to follow. These processes provide for periodic program meetings, conference calls, and program and file reviews, as appropriate. Finally, the two agencies have also developed a Reporting Requirement Inventory, which documents the various reporting requirements associated with grants and programs due to statutes, regulations and/or other policies and agreements. Illinois EPA will continue to fulfill these reporting requirements as outlined in the Inventory, unless a specific item is raised and/or renegotiated. All relevant information is taken into account as part of the joint evaluation process.

Another element in this joint evaluation process is the Senior Management Planning meeting, and the corresponding mid-year check-in meeting. It is expected that national program guidance should be available well before these meetings, allowing for identification of any critical commitment concerns. In addition, one agenda item for these meetings will be a senior level discussion of performance highlights and areas of concern. These discussions will be documented via joint meeting notes.

**II. Enforcement and Compliance Assurance**

Compliance and enforcement activities to be accomplished during the term of the FY12/13 Agreement are included in the individual media program plans. However, a summary of Region 5 and Illinois EPA roles in compliance and enforcement is helpful.

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

- Apply the most effective use of tools to encourage and maintain the compliance of sources of all sizes. This would include compliance assistance, administrative and/or civil enforcement, and criminal enforcement.
- Use joint up-front planning to coordinate priorities, maximize agency resources, avoid duplication of efforts, eliminate surprises, and institutionalize communication.
- Manage for environmental results which support each Agency’s environmental goals and objectives,

- Ensure that compliance and enforcement information is complete, accurate, and timely consistent with Region 5 and Illinois EPA policies.

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

Region 5 has recently conducted a review of Illinois EPA's Clean Air Act (CAA), and Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA) compliance and enforcement programs. Both Region 5 and Illinois EPA are responsible for ensuring that agreed-upon follow-up actions that result from the review are carried out in a timely and effective manner. At the completion of the review, Region 5 provided a list of the actions to Illinois EPA as a basis of regular communication between the two parties to ensure follow-up. Certain actions may also be addressed, as appropriate, to the program workplans within this PPA.

### **III. Quality Management Plan**

All data reported under this agreement will be quality assured and the Illinois EPA will continue to operate in accordance with its approved Quality Management Plan (QMP). The QMP will be updated as needed, and changes will be submitted to Region 5 for approval. In addition, Quality Assurance Project Plans (QAPPs) will be developed as needed in each Bureau for project specific initiatives.

### **IV. Dispute Resolution Process**

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

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

Illinois EPA and Region 5 will ensure that program operations:

- Recognize conflict as a normal part of the State/Federal relationship.
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve disputes.
- Approach the discussion as an opportunity to improve the product through joint efforts.
- Aim for resolution at the staff level, while keeping management briefed. 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. Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. When there is no resolution and the two weeks have passed, there should be a comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

## V. Reporting

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



## Attachment A: Bureau of Air

### Illinois Environmental Protection Agency 2012/2013 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
<b>USEPA Strategic Goal: 1 – Taking Action on Climate Change &amp; Improving Air Quality</b>				
<b>USEPA Strategic Objective 1.1: Address Climate Change.</b> Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking appropriate actions				
<b>Work Plan Outputs/Measures/Outcomes – Air Toxics – Toxics &amp; Global Atmosphere</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work collaboratively to address climate change and reduce greenhouse gas emissions through activities including participation in R5-States Climate Change conference calls.	Jim Ross or Charles Matoesian, Illinois EPA, Suzanne King, EPA	Both Illinois EPA and USEPA are tracking and taking appropriate measures on national, regional and local levels on climate change. Both agencies have committed to an open exchange of information between the agencies as a top priority. USEPA will continue to have conference calls every other month involving the Region V states that provide updates and information on current climate change issues and allow an open exchange of information. Illinois EPA will continue to actively participate in these calls.	
<b>USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.</b>				
<b>USEPA 2011-2015 Strategic Outcomes – Reduce Criteria Pollutants and Regional Haze</b>				
<b>Work Plan Outputs/Measures/Outcomes – Federal Vehicle and Fuels Standards and Certification – Control Strategies</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control strategies such as I/M, OBD, and state fuel programs.	Chris Demeroukas, Mike Hills, Steve Thorpe, Illinois EPA Pamela Blakley, EPA	VIM The Illinois EPA has an ongoing contract with Applus Technologies Inc. to continue On-Board Diagnostics (OBD) vehicle emissions testing in Illinois' ozone non-attainment areas. This contract provides testing through at least 2013, with the option of extending through 2015.  Work to develop I/M SIP based on Motor Vehicle Emissions Modeling during 2012 and 2013 for new ozone standards.  Continue to work with Region 5 in obtaining guidance from OTAQ concerning compliance with and revisions to 40 CFR Part 51, Subpart S – Inspection/Maintenance Program Requirements.	

		Mike Rogers, Illinois EPA Pamela Blakley, EPA	<u>Fuels:</u> The Illinois EPA is developing a rulemaking proposal to the Illinois Pollution Control Board to repeal the state's summertime gasoline volatility regulations as these rules are either identical in substance or less stringent than the existing federal fuel requirements.	
	Work with local Metropolitan Planning Organizations, EPA, and state and federal transportation agencies in future conformity determinations as needed.	Mike Rogers, Illinois EPA Pamela Blakley, USEPA	The Illinois EPA is an active participant in the transportation conformity consultation process. It will continue to work collaboratively with the Chicago Metropolitan Agency for Planning and the East West Gateway Council of Governments on future conformity determinations.	
	Continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES.	Mike Rogers, Illinois EPA Pamela Blakley, EPA	The Illinois EPA will be initiating a comment period on the (85 ppb) Chicago 8-hour ozone and annual PM2.5 Maintenance Plan SIPs and the Metro-East St. Louis 8-hour Ozone SIP. The three SIPs include motor vehicle emissions budgets develop utilizing the MOVES model.	
	Work on deletion of old state conformity MOUs and replacement conformity consultation MOUs, so that states can use the flexibility and be consistent with federal transportation conformity rules.	Mike Rogers, Illinois EPA Pamela Blakley, EPA	The Illinois EPA will be coordinating with the Chicago Metropolitan Agency for Planning, the East West Gateway Council of Governments and the Illinois Department of Transportation to develop either new MOUs or regulations dealing with the transportation conformity consultation requirements.	
	Work with EPA to develop creditable mobile source programs.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue Stage I & Stage II Vapor Recovery programs while we review USEPA's July 15, 2011 proposed rule on implementing a nationwide June 2013 "widespread use" determination. If adopted, this could result in Illinois' discontinuation of its Stage II program. There are 2,455 affected gasoline dispensing facilities (mostly retail gas stations) in the Chicago area currently required to implement Stage I and Stage II volatile emissions controls.  We currently are: determining what, if any comments we will make on the proposed rule; whether Illinois' "widespread use" date is appreciably earlier than the proposed nationwide date; what environmental benefits may be gained or lost if Illinois sought a waiver from the Stage II control requirement; and what, if any costs would be associated with discontinuing Stage II. Illinois EPA will work closely with USEPA as we follow USEPA's rulemaking and	



			understanding Illinois' options regarding Stage II.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue the Tank Truck Certification program. Over 4,000 gasoline tanker trucks get their annual pressure vacuum vapor recovery test to check for stage I emissions.	
	Work with EPA to develop and continue voluntary mobile source programs and initiatives.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue our involvement in the Chicago Area Clean Cities coalition and work to obtain federal grants to provide funding for heavy-duty fleets, taxi companies, and other niche fleets to switch to a clean fuel.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, USEPA	The Illinois EPA will continue the Illinois Alternate Fuels Rebate Program to support AFV purchases for both fleets and the general public.	
		Darwin Burkhart, Illinois EPA Pamela Blakley & Anthony Maietta, EPA	The Illinois EPA is enhancing the Illinois Green Fleets Program by partnering with Chicago Area Clean Cities, Clean Air Counts, and Chicago Climate Action Plan in recognizing more "green fleets," conducting comprehensive annual surveys of participating fleets, and providing more outreach and networking opportunities.	
Joint Priority	Continue to support the Midwest Clean Diesel Initiative (MCDI) including the management of state clean diesel grants, active involvement in state clean diesel coalitions, continued support of the Smartway program, and the promotion, generation and implementation of clean diesel funding, programs, projects, and policies.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to acquire additional funding and implement projects for the Illinois Clean Diesel Grant Program.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to chair the Illinois Clean Diesel Workgroup, which assists the agency in soliciting projects and conducting outreach.	

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

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Operate monitors for other NAAQS pollutants, NCore, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including QMPs AND QAPPs.	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will submit the annual updates to the 5-Year Integrated Strategy Monitoring Plan each July along with the proposed air monitoring network plan for the next calendar year. The 2012 Illinois EPA monitoring network plan was submitted to Region 5 by July 1, 2011, following the 30 day comment period.	
		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue the operation of the four PAMS monitoring sites.	
		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue to coordinate the Illinois Monitoring Network along with Cook County Department of Environmental Control and special monitoring requests from the City of Chicago Department of Environment.	
		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue to participate in the real-time ozone and particulate reporting system (AIR NOW) and support the daily forecast program.	
		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue operation of the PM <sub>2.5</sub> monitoring network.	
		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue to implement the Northbrook Ncore program and will assist Region 5 in the implementation of the Bondville NCore site.	

		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will continue to perform any and all audits necessary to maintain accurate monitors and monitoring data.	
All state/local primary quality assurance organizations submit NAAQS pollutant data, PAMS, and QA data to AQS directly or indirectly through another organization according to schedule in 40 CFR Part 58.		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will submit air quality data to AQS on the schedules required. Illinois EPA will submit quality assurance and PEP data on the schedules required.	
Certify 2011 NAAQS and toxics pollutant data in AQS and provide supporting documentation by May 1, 2012.		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The annual certification letter and statistical data summaries will be sent by May 2012.	
Submit DML formatted AQS data by the end of 2012 or at the latest the end of 2013.		Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Continuous and intermittent air quality data will be sent to AQS in DML format as soon as possible. A test data submittal will be made to AQS in 2012. AMS is in the process of preparing to submit the test data.	

	<p>Submit 2013 annual network plan required by 40 CFR §58.10, by July 1, 2012, unless another schedule has been approved. The plan should provide for the movement or start-up of additional ozone monitoring stations associated with smaller urban areas and non-urban areas, if required. If finalized the ozone monitors should be operational the first day of ozone season in 2013. The plan should also consider SO<sub>2</sub> monitoring required in core Base Statistical Areas (CBSA's) based on populations emissions. All new SO<sub>2</sub> monitoring is required to be operational by January 1, 2013. The plan should also consider NO<sub>2</sub> Roadway monitoring is required to be operational by January 1, 2013.</p>	<p>Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA</p>	<p>A complete network review will be completed by May 1, 2012, and a draft plan for 2013 prepared by June 1, 2012. The proposed plan will be made available for public review 30 days before submittal to USEPA. Any new air monitoring requirements promulgated by USEPA and effective for 2013 will be included in the proposed 2013 plan. This is the annual process and the 2012 plan followed the process.</p>	
	<p>Ensure adequate, independent QA audits of NAAQS monitors, including PEP and NPAP or equivalent.</p>	<p>Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA</p>	<p>All required QA audits will be performed. Illinois EPA will expand its QA and auditing staff and obtain additional auditor training.</p>	
	<p>Report real time ozone and PM<sub>2.5</sub> data to AIRNOW for cities required to report the AQI.</p>	<p>Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA</p>	<p>Ozone and PM<sub>2.5</sub> data will be sent daily (business days) to AIRNOW along with next day forecasts and Air Pollution Action Day declarations.</p>	
	<p>Implement lead monitoring at non-source-oriented At NCore sites in CBSAs over 500,000 people.</p>	<p>Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA</p>	<p>Lead monitoring at the Northbrook NCore site has been in place since 2008 and will continue as required.</p>	

	Attend the annual Region 5 State/Local/Tribal Air Monitoring Contacts meeting, Participate in the monthly S/L/Tribal monitoring calls. Attend the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference if they are held.	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will attend the annual Region 5 Contacts meeting. Attendance at the National meeting outside of Illinois will occur only if out-of-state travel for air monitoring is approved.	
	Reporting – Illinois EPA and EPA will endeavor to conduct weekly conference calls beginning the first week of October, 2011 between the Illinois EPA Air Monitoring Section Manager (or his or her designee) and EPA AMAS Section Chief (or his or her designee); unless an alternative schedule is agreed to by both parties. These calls are intended to provide EPA updates on training, staffing, and equipment replacement and purchases.	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will participate in conference calls with EPA to discuss updates on training, staffing, and equipment replacement and purchases.	
	Worksharing/Training - EPA will provide technical support to Illinois EPA QA auditing staff to ensure QA and Performance Evaluation Program (PEP) audit proficiency. Training will be conducted in Region 5 and/or the Illinois EPA NCore Site. Training topics will cover: a. Performance audits for ozone, Sulfur Dioxide (SO <sub>2</sub> ) and Carbon Monoxide (CO) monitor to provide an in-the-laboratory procedures review, certification of auditing	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA staff will participate in audit and validation training.	

	<p>equipment and on-the-bench auditing of ambient monitors. The purpose of this training is to provide specific hands on training for the performance of QA audits of these gas analyzers.</p> <p>b. In-the-field audits of ozone, SO<sub>2</sub> and CO monitors to conduct comparison QA audits at priority monitoring sites using both EPA and Illinois EPA audit equipment. The purpose of this activity is to provide in-the-field experience in performing audits, inter-agency comparison of audit results and to provide an independent audit of Illinois EPA analyzers.</p> <p>c. Particulate Matter<sub>2.5</sub> (PM<sub>2.5</sub>) PEP Audit program to provide an overview of the PEP audit requirements, procedures and certification of audit equipment. Conduct actual PEP audits at priority PM<sub>2.5</sub> sites. The purpose of this activity is to provide in-the-field experience in performing audits and reporting of results.</p> <p>d. Additional data validation training will be conducted through the Lake Michigan Air Directors Consortium in</p>			
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	Rockford, IL on October 25-26, 2011. Illinois EPA will provide the names (or at least the number of staff) that will be attending this training. Training will be updated in the weekly calls.			
	Equipment Replacement	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide regular updates, in addition to the status of any additional equipment, in the weekly calls. Illinois EPA agrees to prioritize their existing equipment replacement schedule and create and submit to EPA, an equipment replacement plan and schedule by December 1, 2011. EPA recognizes that this is an evergreen document that will be revised from time to time to reflect funding, regulatory changes, and unexpected events; e.g., damage to a monitoring site due to tornado, hail, rain, vandalism, etc.	
	Near Roadway Nitrogen Dioxide (NO <sub>2</sub> ) network	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide regular updates, in addition to the status of any additional equipment, in the weekly calls. If funding is timely provided by EPA, Illinois EPA will purchase the equipment necessary for the NO <sub>2</sub> Near Roadway Network, and the site will be operational by January 2013.	
	Lead (Pb)	Air Monitoring Section Manager or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will upload the Juarez Pb monitoring data into Air Quality System (AQS); Illinois EPA will identify the monitoring type as 'Non-Regulatory' in AQS. Second phase lead monitoring will be implemented December 29, 2011.	

**Work Plan Outputs/Measures/Outcomes – Attainment Planning and Maintenance**

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to review air quality data and will take appropriate actions to address new violating areas.	
	As appropriate, submit redesignation requests including maintenance plans for areas with	Rob Kaleel or his designee, Illinois EPA Douglas Aburano,	The Illinois EPA submitted Maintenance Plans and redesignation requests for the Chicago and Metro-East nonattainment areas as both areas have attained the 1997 8-hour ozone standard. The	

	clean air quality data.	Edward Doty, EPA	Illinois EPA will update these plans to include conformity budgets using the MOVES mobile source emissions model.	
		Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA submitted a Maintenance Plan and redesignation request for the Chicago area for the PM <sub>2.5</sub> annual standard based on air quality data from 2006-08. USEPA published its final clean data finding which satisfies the obligation to submit an attainment demonstration for Chicago. Illinois EPA has submitted data and is seeking a clean data finding for PM <sub>2.5</sub> for the Metro-East area.	
	Continue to implement 8-hr ozone SIPs.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement the SIP developed for the 8-hour ozone NAAQS.	
	Submit any outstanding 1997 PM <sub>2.5</sub> and ozone SIP elements, including SIPs due for the 1997 8-hour ozone Subpart 1 nonattainment areas that were reclassified to Subpart 2 and SIPs due for the 1997 8-hour ozone moderate nonattainment areas that were reclassified to serious.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA is revising the VOC RACT rules in response to comments received from USEPA. These rules will be submitted as SIP revisions after approval by the Illinois Pollution Control Board.	
	Prepare recommendations on designations for revised NAAQS.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by USEPA.	
	Facilitate implementation of NOx and SO2 requirements under Transport Rule.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will facilitate implementation of CAIR and the new Cross-State Air Pollution Rule by affected sources in Illinois.	
	Begin evaluating technical information used to support 2011 PM <sub>2.5</sub> , CO, and ozone NAAQS state recommendations for designations.	Rob Kaleel or his designee, Illinois EPA, Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by USEPA.	



	Consult with EPA, as necessary, to finalized area designations for the NO <sub>2</sub> primary and SO <sub>2</sub> primary NAAQS.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA provided timely recommendations on attainment/nonattainment designations for the revised NO <sub>2</sub> and SO <sub>2</sub> NAAQS. The Illinois EPA will continue to work with USEPA to finalize the area designations.	
	Continue to implement SIPs for 1997 PM <sub>2.5</sub> and ozone NAAQS.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement the SIP developed for the 1997 8-hour ozone and PM <sub>2.5</sub> NAAQS.	
	Develop and submit 2006 PM <sub>2.5</sub> NAAQS SIPs. (Due no later than December 2012.)	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	Illinois does not have any areas designated as nonattainment for the 2006 PM <sub>2.5</sub> NAAQS.	
	Work with EPA to develop and implement local ozone reduction programs to help achieve attainment of 2011 8-hour ozone NAAQS to designations process.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to work with USEPA to develop and implement local ozone reduction programs.	
	Submit SIPs for the § 110(a)(2) infrastructure. (Due in October 2011.)	Rob Kaleel or his designee, Illinois EPA	The Illinois EPA will timely submit Infrastructure SIPs under § 110(a)(2).	
	Submit SIPs for lead NAAQS. (Due January 2013.)	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit timely attainment SIPs for areas designated nonattainment for the lead NAAQS.	
	Submit SIPs for the areas designated lead nonattainment areas in December 2010. (Due June 2012.)	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit timely attainment SIPs for areas designated nonattainment for the lead NAAQS.	

	Conduct public notifications and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution.	Kim Biggs, Illinois EPA	The Illinois EPA maintains the air quality notification system, EnviroFlash, for six regions in Illinois, providing daily air quality forecasts and air quality alerts. The Agency, in conjunction with Partners for Clean Air has been increasing enrollment in the notification system since 2009 with more than 3,000 current subscribers. Public education and outreach was expanded with May 2011 being declared Air Quality Awareness Month in Illinois. This included an education campaign launched in the Chicago area to encourage residents to “Get to Know YOUR Air Quality”. The campaign featured sponsored weather segments where the daily forecast was reported, radio ads, and print ads. The Illinois EPA and Partners will be expanding the “Get to Know YOUR Air Quality” to a year round campaign, encouraging residents to sign up for air quality forecasts through U.S.EPA’s EnviroFlash program.	
	Assist with outreach and capacity building for minority, low-income and indigenous communities to improve understanding of and engagement in regulatory and permitting processes.	Brad Frost, Illinois EPA	Utilize the Illinois EPA Environmental Justice Policy. Notify the Environmental Justice Officer of projects in Environmental Justice areas. Participate in the Illinois EPA Environmental Justice Advisory Group.	
	Consult with EPA as necessary to finalize area designations on revised 2008 ozone and lead NAAQS.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to consult with USEPA on area designations for the revised ozone and lead NAAQS.	
<b>Work Plan Outputs/Measures/Outcomes – Regional Haze – Attainment Planning and Maintenance</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Continue to work with EPA, Region 5 on issues related to submitted regional haze SIPs.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to consult with USEPA on issues related to Illinois’ regional haze SIP.	
	Implement BART requirements.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement BART emission limits through federally enforceable permits.	

	Submit any outstanding regional haze SIP elements.	Rob Kaleel or his designee, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will work with LADCO and other Midwestern states to prepare and submit a mid-course review of the progress goals established in the regional haze SIP.	
Work Plan Outputs/Measures/Outcomes - Permitting				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Provide timely review of construction permits issued compliant with Greenhouse Gas BACT.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	PSD/NSR Permitting: Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, will notify EPA of any GHG BACT applications during the monthly conference calls, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit.	
	Target issuance of major PSD/NSR permits within one year of receiving a complete permit application.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to issue construction permits and PSD and NSR permits as expeditiously as practicable.	
	Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RACT/BACT/LAER Clearinghouse (RBLC).	Ed Bakowski or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to timely submit data to the RACT/BACT/LAER Clearinghouse.	
	Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including “the application accepted date” and “the permit issuance date” in to the RBLC national database.	Ed Bakowski or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will provide timeliness data.	

	PSD-delegated States coordinate with EPA to ensure that Endangered Species Act consultations are handled in a timely manner.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	As related to consultation under the federal Endangered Species Act (ESA), consultation with the USFWS for the planned issuance of permits for proposed projects will be performed by EPA, working directly with applicants for proposed projects. The Illinois EPA will instruct applicants to directly contact EPA to initiate EPA's ESA review and consultation. The Illinois EPA and EPA will attempt to coordinate their respective roles in permitting so that ESA consultation is handled in an efficient and timely manner and that the ESA consultation process does not unduly delay the issuance of PSD permits.	
	Provide PSD/NSR permit applications to EPA prior to the start of the public comment period.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit. The Illinois EPA and EPA will continue to hold monthly permit program calls and New Source Review permit calls for issue resolution and information sharing.	

**USEPA Strategic Goal: 1 – Taking Action on Climate Change & Improving Air Quality**  
**USEPA Strategic Objective 1.1: Address Climate Change.** Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking appropriate actions

<b>Work Plan Outputs/Measures/Outcomes – Air Toxics</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities or Commitments</b>	<b>Performance Partnership Grant Status/Progress</b>
	<b>Emission Inventory:</b> (1) Develop HAP emission inventories for submission to EPA's National Emissions Inventory (NEI) database; (2) submit data for the integrated HAP emissions inventory; (3) Quality assure, validate, and revise NEI data using EIS; and (4) Participate in Regional emission inventory workgroup conference calls.	David Asselmeier or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	The Illinois EPA will continue to provide appropriate and accurate data and work together with EPA to review and ensure the quality of data.	

	Implement delegated 112 of the Clean Air Act, as appropriate, for major sources residual risk, and area sources.	Rob Kaleel or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA continues to be an active participant in the implementation of standards under Section 112 of the Clean Air Act (e.g., MACT, area source NESHAPs). Illinois EPA has delegated authority for implementation of these regulations. Illinois EPA will continue to provide outreach, education, and other assistance to affected sources primarily through the Small Business Environmental Assistance Program.	
	Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.	Rob Kaleel or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in quarterly Region 5 conference calls and annual air toxics meetings as appropriate.	
	Review and analyze NATA data, as available. Region 5 will provide timely access to and assistance to the review of the NATA data.	Rob Kaleel or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in the review process for NATA.	
	Participate as appropriate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants.	Rob Kaleel or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA remains open to discussions involving its participation in a Regional Air Toxics Priority Project and/or addressing High Risk Point Sources as identified through NATA. Illinois may participate to the extent appropriate, in consideration of available resources, through emissions verification, data review and site visits.	
	<b>Great Lakes Air Deposition Program:</b> Address the deposition of persistent bioaccumulative toxics (PBTs) in the waterways of the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.	David Asselmeier or his designee, Illinois EPA Erin Newman, EPA	Illinois EPA will continue to participate in the on-going discussions regarding the inventory compilation and the design of the new RAPIDS 3.x software.	

**USPEA Strategic Goal: Enforcing Environmental Laws**

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

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

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2011) Implementation of the final CMS plan will begin the upcoming federal fiscal year, as it pertains to non-Title V sources. The CMS plan should meet EPA's September 10, 2010 CAA Stationary Source CMS policy.	Steve Youngblut or his designee, Illinois EPA Rochelle Marceillars, Joseph Koester, EPA	The Illinois EPA will continue to submit and implement the Illinois CMS plan as approved by EPA. The CMS source category and frequency flags in AFS will be completed for non-Title V major source universe by the State by October 1, 2011. U.S. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan submittal. (December 31, 2011)	
	Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's March 31, 1988 Revised Asbestos NESHAP Strategy. (Ongoing)	Steve Youngblut or his designee, Illinois EPA Brent Marable, EPA	The Illinois EPA will continue to inspect sources/landfills in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy.	
	Track State Review Framework recommendations made by EPA to the States until completion and provide updates to USEPA, as it pertains to non-Title V sources. (Quarterly)	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Brent Marable, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	
	Respond to citizen complaints including those referred from EPA.	Steve Youngblut, Illinois EPA, Brent Marable, EPA	The Illinois EPA will continue to respond to citizen complaints and inspections will be conducted where necessary.	

Work Plan Outputs/Measures/Outcomes – Enforcement - Reporting				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the current Air Facility System (AFS) Information Collection Request (ICR). Ensure data is complete, accurate and timely consistent with EPA policies and ICR, as it pertains to non-Title V sources. Such language should be included in the written agreement between the State and EPA. (60 day reporting as required by ICR)	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Rochelle Marceillars, Joseph Koesters, EPA	The Illinois EPA will submit MDRs in accordance with the current AFS ICR.	
	Asbestos notification information, compliance evaluations and enforcement activities will be reported alphabetically by owner or operator to the EPA by the State. (Annually)	Steve Youngblut or his designee, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will report the gross count of Asbestos notifications received and will provide EPA with a list of inspections performed and enforcement actions taken.	
	Report Continuous Emission Monitoring (CEM) Information	Ray Pilapil, David Bloomberg, Illinois EPA Kevin Vuilleumier, EPA	Illinois EPA will provide to U.S. EPA, at the minimum, the name and city of facilities reporting CEMS to Illinois EPA, as it pertains to non-Title V sources.	



Work Plan Outputs/Measures/Outcomes - Enforcement				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Compliance and Enforcement Activities	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Brent Marable, Debra Flowers, Rochelle Marceillars, EPA	EPA and Illinois EPA will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, Federal and State HPV cases, data management and reporting, and efforts to resolve violations, as it pertains to non-Title V sources. For State lead HPV cases unaddressed over the 270 day timeframe, EPA will provide notice to Illinois EPA of EPA's intent to take or maintain the lead for the case and will discuss the status of the state case with the Illinois EPA. Any data issues will also be discussed on the conference calls.	
	HPV sources listed on Headquarters Watch List, as it pertains to non-Title V sources - the Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQs OECA, Region 5 EPA and/or Illinois EPA. (Quarterly)	Ray Pilapil, David Bloomberg, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will continue to provide to EPA the status codes and explanations for the HPV sources listed on Headquarters' Watch List as it pertains to Non-Title V sources.	
	State will conduct its enforcement activities in accordance with the December 22, 1998, EPA Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, October 25, 1991, Clean Air Act Stationary Source Civil Penalty policy and March 31, 1988, Revised Asbestos NESHAP Strategy, as it pertains to non-Title V sources. (Ongoing)	Ray Pilapil, David Bloomberg, Julie Armitage, Steve Youngblut, Illinois EPA Brent Marable, EPA	The Illinois EPA will continue to conduct enforcement activities in accordance with the policies identified in the Template Measures.	



## APPENDIX A

### Title V

*Title V activities are not part of the State Air Pollution Control Program funded with EPA Clean Air Act funding.*

USEPA Strategic Goal: 1 Clean Air & Global Climate Change				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Target of the issuance significant power plant and refinery Title V permits in FY 2012.	Ed Bakowski or his designee, Illinois EPA Genevieve Damico, EPA	Recognizing that the Work Plan commitments have the highest priority and the limitations on processing the Title V power plant permits that are under appeal, to the extent practicable, the Illinois EPA will then prioritize the issuance of significant power plant and refinery Title V permits.	
	Obtain a reduction in Title V renewal backlog in accordance with the Work Plan established between Illinois EPA and EPA Region.	Ed Bakowski or his designee, Illinois EPA Genevieve Damico, EPA	Illinois EPA will meet or exceed the commitments established in the Work Plan established between Illinois EPA and EPA Region.	
	Provide timeliness data on new and renewal of Title V permits and significant permit modifications to EPA Regional office for entry into TOPS.	Assigned permit engineers Genevieve Damico, EPA	Illinois EPA will enter new and renewed Title V permits and significant modification data into TOPs by January 31 and July 31 of each year.	
USEPA Strategic Goal: Enforcing Environmental Laws				
USEPA Strategic Objective 5.1: Enforcement Environmental Laws. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2011) Implementation of the final CMS plan will begin the upcoming federal fiscal year. The CMS plan should meet EPA's September 10, 2010 CAA Stationary Source CMS policy.	Steve Youngblut, Ernie Kierbach, Illinois EPA Rochelle Marceillars, Joseph Koester, EPA	The Illinois EPA will continue to submit and implement the Illinois CMS plan as approved by EPA. The CMS source category and frequency flags in AFS will be completed for Title V major source universes by the State by October 1, 2011. U.S. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan submittal. (December 31, 2011)	

	Track State Review Framework recommendations made by EPA to the States until completion and provide updates to USEPA. (Quarterly)	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Brent Marable, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	
	Respond to citizen complaints including those referred from EPA.	Steve Youngblut, Illinois EPA Brent Marable, EPA	The Illinois EPA will continue to respond to citizen complaints and inspections will be conducted where necessary.	

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

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the current Air Facility System (AFS) Information Collection Request (ICR). Ensure data is complete, accurate and timely consistent with EPA policies and ICR. Such language should be included in the written agreement between the State and EPA. (60 day reporting as required by ICR)	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Rochelle Marceillars, Joseph Koesters, EPA	The Illinois EPA will submit MDRs in accordance with the current AFS ICR.	
	Asbestos notification information, compliance evaluations and enforcement activities will be reported alphabetically by owner or operator to the EPA by the State. (Annually)	Steve Youngblut, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will report the gross count of Asbestos notifications received and will provide EPA with a list of inspections performed and enforcement actions taken.	
	Report Continuous Emission Monitoring (CEM) Information	Ray Pilapil, David Bloomberg, Illinois EPA Kevin Vuilleumier, EPA	Illinois EPA will provide to U.S. EPA, at the minimum, the name and city of facilities reporting CEMS to Illinois EPA.	

**Work Plan Outputs/Measures/Outcomes - Enforcement**

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Compliance and Enforcement Activities	Ray Pilapil, David Bloomberg, Steve Youngblut, Julie Armitage, Illinois EPA Brent Marable, Debra Flowers, Rochelle Marceillars, EPA	EPA and Illinois EPA will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, Federal and State HPV cases, data management and reporting, and efforts to resolve violations. For State lead HPV cases unaddressed over the 270-day timeframe, EPA will provide notice to Illinois EPA of EPA's intent to take or maintain the lead for the case and will discuss the status of the state case with the Illinois EPA. Any data issues will also be discussed on the conference calls. (Monthly)	
	HPV sources listed on Headquarters' Watch List - the Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQ's OECA, Region 5 EPA and/or Illinois EPA. (Quarterly)	Ray Pilapil, David Bloomberg, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will continue to provide to EPA the status codes and explanations for the HPV sources listed on Headquarters' Watch List as it pertains to Title V sources.	
	State will conduct its enforcement activities in accordance with the December 22, 1998, EPA Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, October 25, 1991, Clean Air Act Stationary Source Civil Penalty policy and March 31, 1988, Revised Asbestos NESHAP Strategy. (Ongoing)	Ray Pilapil, David Bloomberg, Julie Armitage, Steve Youngblut, Illinois EPA Brent Marable, EPA	The Illinois EPA will continue to conduct enforcement activities in accordance with the policies identified in the Template Measures.	

## Attachment B: Bureau of Land

### Illinois Environmental Protection Agency 2012/2013 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
<b>Strategic Goal 3: Cleaning up Communities &amp; Advancing Sustainable Development</b>				
<b>Strategic Objective 3.1: Preserve Land</b>				
<b>Work Plan Outputs/Measures/Outcomes – Hazardous Waste Management</b>				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.801		Paul Little-EPA		
	Number of hazardous waste facilities with new or updated controls.	Rob Watson	% of hazardous waste managed Treatment, Storage, and Disposal facilities with controls in place	
		Steve Nightingale	Review and reissue RCRA Part B operating permits in response to renewal applications.	
	Amount of hazardous waste managed at commercial treatment/disposal facilities annually	Hope Wright	Report tons of hazardous waste managed at commercial treatment/disposal facilities	
	% of Resource Conservation and Recovery Act (RCRA) regulated & inspected sites will be in full compliance, under an accepted compliance commitment agreement, or referred for formal enforcement within 180 days of inspection date	Brian White	Report Significant Non-Compliers (SNC) rate within compliance monitoring program.	
		Bill Ingersoll	Assess and report environmental benefits that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc.	
	Ensure proper closure and post-closure of all inactive hazardous waste landfills	Rob Watson	Report % of Government Performance Results Act (GPRA) Baseline Post-Closure Universe facilities brought under control.	
	Ensure groundwater monitoring at permitted facilities that treat, store and dispose of hazardous waste.	Terri Myers	Report % of hazardous waste management facilities conducting detection monitoring and report % of hazardous waste management facilities conducting assessment/compliance monitoring.	
	Routine compliance monitoring activities	Mike Davison	Conduct 16 Compliance Evaluation Inspections (CEI) at Treatment, Storage, Disposal Facilities (TSDFs)	

		Mike Davison	Conduct & Report Comprehensive Groundwater Monitoring Evaluations (GME) at TSDFs	
		Mike Davison	Conduct 12 Operation & Maintenance (O & M) at TSDFs	
		Mike Davison	Conduct at least 1 Compliance Schedule Evaluation (CSE) at TSDFs	
		Brian White	Conduct & Report Financial Record Reviews (FRR) at TSDFs	
		Mike Davison	Conduct & Report Non-Financial Record Reviews (NRR) at TSDFs & generators.	
		Mike Davison	Conduct 189 CEIs for large quantity generators	
		Mike Davison	Conduct 265 CEIs for small quantity generators	
		Mike Davison	Conduct & Report CEI conducted at conditionally-exempt small quantity generators	
		Mike Davison	Conduct & Report CEI for transporters	
		Mike Davison	Conduct & Report CEI for non-handlers & generator status not determined	
	Non-routine compliance monitoring activities	Mike Davison	Conduct & Report of citizen complaints and investigations	
		Mike Davison	Conduct & Report follow-up inspections (FUI)	
		Mike Davison	Conduct & Report case development inspections	
		Mike Davison	Conduct & Report focused compliance inspections	
	RCRAInfo Data Management	Mike Davison	Illinois EPA will timely enter all RCRAInfo data fields for which it is the State implementer of record (IOR). The IOR tables in RCRAInfo define the fields for which Illinois is the owner and has data entry responsibilities. Data will be entered within one month of the completion of any recordable RCRA program activity. Illinois EPA will also maintain and update implementer owned codes in the RCRAInfo look-up tables, will keep the RCRA program universe records current, and will submit biennial report files in accordance with timeframes established by EPA's Office of Resource Conservation and Recovery.	

	Oversight Arrangement	Todd Marvel	<p>Illinois EPA will:</p> <ul style="list-style-type: none"> <li>a) Conduct an annual mid-year program meeting;</li> <li>b) Conduct at least quarterly program enforcement conference calls;</li> <li>c) Conduct joint inspections as needed or requested; and</li> <li>d) Investigate and respond to inquiries from EPA concerning facilities that do not appear to have been timely and/or appropriately addressed under Illinois' enforcement program. This will include at least one annual meeting between EPA and Illinois EPA to discuss the file audit results.</li> </ul>	
<b>Work Plan Outputs/Measures/Outcomes – Underground Injection Control Program</b>				
<b>Grant Code</b> CFDA 66.433	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
		Bur Filson	Class I Permitting: By December 31, 2011, Illinois EPA will issue a draft decision on Cabot's application to renew its permit for two Class I hazardous wells.	
		Bur Filson	Class I Inspections: Illinois EPA will conduct one inspection at each of the 3 Class I facilities annually covering the 4 Class I wells in the State's inventory.	
		Bur Filson	Class I File Reviews: Illinois EPA will conduct monthly compliance reviews of required reports from operators (includes monthly monitoring reports and well log data).	
		Bur Filson	Class I MITs (National Program Measure): Illinois EPA will ensure that 100% of Class I wells that lose MI are returned to compliance within 180 days. (SDW-7)	

		Bur Filson	Class V Closures (National Program Measure): In the first year of this agreement, Illinois EPA will close 1 high priority Class V well found within Illinois wellhead protection areas. Illinois EPA will use informal methods and enforcement including, but not limited to, violation notices and compliance commitment agreements, to close Class V wells in sensitive areas. Illinois EPA will report the number of closed Class V wells and notify USEPA regarding progress in closing other Class V wells within sensitive areas in Illinois. At the mid-term, Illinois EPA and USEPA will jointly review the State's progress and plan for the Class V actions to be taken in the second year of this agreement.	
		Bur Filson	Reporting: Illinois EPA will provide Program Activity Measure data and 7520s to USEPA by April 15 <sup>th</sup> and October 15 <sup>th</sup> . Illinois EPA will also provide well inventory data on or before January 15 <sup>th</sup> .	
		Bur Filson	Carbon Sequestration (National Program Indicator): Illinois EPA will carry out the following activities as resources allow. Illinois EPA will collaborate with USEPA on Class VI permits and on regional and national issues as they evolve, particularly in relation to primacy, regulatory developments, and policy changes. Illinois EPA and USEPA will facilitate interaction and exchange between key stakeholders such as DOE-funded research groups, other state and federal regulators, and environmental groups through avenues such as meetings and workshops to expand regional experience with and expertise on carbon sequestration.	



<b>Strategic Objective 3.2: Restore Land</b>				
<b>Work Plan Outputs/Measures/Outcomes – Resource Conservation &amp; Recovery Act (RCRA)</b>				
<b>Grant Code</b> CFDA 66.801	<b>Template Measures</b>	<b>Contacts</b> Joe Cisneros-EPA	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
	Number of 2020 GPRA baseline facilities with human exposures under control	Jim Moore	Take necessary actions to help Region 5 to achieve FY12 and FY13 GPRA goals. Achieve 81% and 85% of human exposures brought under control in FY12 and FY13 respectively.	
	Number of 2020 GPRA baseline facilities with migration of contaminated groundwater under control	Terri Myers	Take necessary actions to help Region 5 to achieve FY12 and FY13 GPRA goals. Achieve 69% and 73% of migration to groundwater brought under control in FY12 and FY13 respectively.	
	Number of 2020 GPRA baseline facilities with remedy construction complete	Jim Moore	Take necessary actions to help Region 5 to achieve FY12 and FY13 GPRA goals. Achieve 46% and 51% of remedy construction are to be completed in FY12 and FY13 respectively.	
		Mike Davison	Require investigation and cleanup of releases at hazardous waste management facilities.	
		Brian White	Financial Record Reviews (FRR), Illinois EPA will conduct financial assurance reviews to verify compliance status with the RCRA financial assurance requirements.	

<b>Strategic Goal 5: Enforcing Environmental Laws</b>				
<b>Strategic Objective 5.1: Enforce Environmental Laws</b>				
<b>Work Plan Outputs/Measures/Outcomes – Office of Solid Waste and Emergency Response</b>				
<b>Grant Code</b> CFDA 66.605	<b>Template Measures</b>	<b>Contacts</b> Mardi Klevs-EPA	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
	TSCA Activities	Beth Unser	Conduct routine TSCA inspections statewide as mutually agreed. Illinois EPA will perform 26 PCB inspections for FY12. Inspections will be targeted according to joint inspection priorities determined by Illinois EPA and USEPA. At least 5 inspections will be conducted at natural gas pipeline compressor stations. Natural gas inspections will be done at both interstate and local distribution companies.	



		Beth Unser	Submit inspection reports in a timely manner, including quarterly spreadsheet of the inspections conducted. Each inspection report will include mention as to whether the area where the inspection took place meets the State's environmental justice criteria.	
		Beth Unser	Will provide oversight of PCB remediation activities by site visits or written or verbal communication.	
		Beth Unser	Continue participation in USEPA's digital inspector program by gathering inspection data electronically and will update equipment and software as funding allows.	
		Beth Unser	Inspectors will attend annual training.	

**Work Plan Outputs/Measures/Outcomes – Enforcement and Rules Development/Authorization**

<b>Grant Code</b> CFDA 66.801	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
	Enforcement and Rules Development Activities	Paul Little-EPA Dan Merrimam	Report number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases.)	
		Mike Davison	Illinois EPA will review and ensure the accuracy of the adoption of RCRA rules promulgated by USEPA in a timely manner.	
		Todd Marvel	Illinois EPA will submit Authorization Revision Application (ARA) 9, which will include all applicable RCRA rules promulgated to date.	

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

**Strategic Objective 2.1: Protect Human Health**

**Work Plan Outputs/Measures/Outcomes – Carbon Sequestration**

<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Activities</b>	<b>Performance Partnership Grant Status/Progress</b>
Joint Priority	Volume of CO2 sequestered through injection as defined by the UIC Final Rule.		Illinois EPA will continue to participate in the Midwest Geological Sequestration Consortium (MGSC).	

Joint Priority	Number of permit decision during the reporting period that result in CO2 sequestered through injection as defined by the UIC Final Rule.		The Illinois EPA will continue to keep the USEPA informed of CO2 projects they will be responsible for permitting.	
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## Attachment C: Bureau of Water

### Illinois Environmental Protection Agency 2012/2013 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.1: Water Safe to Drink				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Dave McMillan/Mike Crumly	In FY2012, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Dave McMillan/Mike Crumly	In FY2012, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	In FY2012, minimize risk to public health through source water protection for 50% of CWSs (i.e. "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	
SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	By FY2012, minimize risk to public health through source water protection for 42% of the population served by CWSs (i.e. "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	

SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment Rules.	Dave McMillan/Rick Cobb	In FY2012, 95% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.	
SDW-SP2	By FY2012, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of "person months" (i.e., all persons served by CWSs times 12 months).	U.S. EPA, Region 5	This measure is generated by U.S. EPA through a database query and calculation with a target of 95% person months of the affect population receiving compliant water.	
SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).	Geoff Andres		
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative)	Geoff Andres	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	
		Geoff Andres	By FY2013, Illinois EPA will amend SRF program rules to incorporate priority and eligibility for the "green project reserve" and green infrastructure projects in the SRF Clean Water and Drinking Water programs.	
		Geoff Andres	Illinois EPA will continue the current practice of "banking" set-aside allotments under the Drinking Water SRF and will evaluate priorities for the utilization of those funds.	

		Geoff Andres	In FY2012, Illinois EPA will transition to a new Loan and Grant Tracking System (LGTS); an initiative designed to improving reporting capabilities while increasing program efficiency and security.	
<b>Strategic Goal 2: Protecting America's Waters</b>				
<b>Strategic Objective 2.1.3 Water Safe for Swimming</b>				
<b>Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
SS-1		Amy Dragovich	<u>Combined Sewer Overflow (CSO) Permits</u> – Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable.	
		Amy Dragovich	Illinois EPA and EPA will develop a permitting strategy for excess flow facilities to identify permit requirements for such dischargers, by March 31, 2012. Illinois EPA will implement the strategy in permit actions for these facilities beginning in April 2012.	
		Amy Dragovich	Illinois EPA shall approve the City of Chicago CSO Operational and Maintenance Plans incorporating Region 5's November 12, 2009 comments by January 15, 2012. IEPA will provide a pre-public notice permit for the City of Chicago CSO permit upon issuance of the MWRDGC permits and issue a final permit within 90 days of issuing MWRD permits for Stickney, Northside, and Calumet WRPs, unless a public hearing is necessary.	
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated in to an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: Implementation of an approved Long Term Control Plan (LTCP); or Implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.	

SS-1 + Clean Water Action Plan		Amy Dragovich	Once the schedule is finalized Illinois EPA will send an update to Region 5 by the end of every month. Illinois EPA will update USEPA CSO LTCP status spreadsheet, internal monthly reporting, and to track progress toward meeting goals under the CSO Control Plan Policy.	
<b>Strategic Goal 2: Protecting America's Waters</b>				
<b>Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis</b>				
<b>Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis</b>				
<b>Grant Code</b>	<b>Template Measures</b>	<b>Contacts</b>	<b>Performance Partnership Agreement Planned Accomplishments</b>	<b>Performance Partnership Grant Status/Progress</b>
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative)	Geoff Andres	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the “green project reserve”.	
		Geoff Andres	By FY 2013, Illinois EPA will amend SRF program rules to incorporate priority and eligibility for the “green project reserve” and green infrastructure projects in the SRF Clean Water and Drinking Water programs.	
		Geoff Andres	In FY 2012, Illinois EPA will transition to a new Loan and Grant Tracking System (LGTS); an initiative designed to improving reporting capabilities while increasing program efficiency and security.	
SP-10	Measure W	Amy Walkenbach	Measure W tracks watersheds where water quality conditions have improved by using a watershed approach. One of the primary purposes of this measure is to model and demonstrate the effectiveness of the watershed approach. Illinois EPA has submitted Jelkes Creek and Dutchmans Creek Watersheds as new Measure W watersheds. Governor Bond and Pittsfield watersheds have already been approved.	
	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained (cumulative.)	Amy Walkenbach	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database.	

WQ01a	Number of numeric water quality standards for total nitrogen and for total phosphorus adopted by States & Territories and approved by USEPA, or promulgated by EPA, for all waters within the State or Territory for each of the following waterbody types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280.)	Bob Mosher	The Illinois EPA will continue to work with Region 5 to adopt nutrient water quality standards.	
WQ01b	Number of numeric water quality standards for total nitrogen and total phosphorus at least proposed by States and Territories, or by EPA proposed rulemaking for all waters within the State or Territory for each of the following water body types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280).	Bob Mosher	Illinois EPA will keep USEPA apprised of developments in rivers/streams water quality standards for phosphorus including projected adoption date when this information becomes available.	

WQ01c	Number of States & Territories supplying a full set of performance milestone information to USEPA concerning development proposal, and adoption of numeric water quality standards for total nitrogen and total phosphorus for each waterbody type within the State or Territory (annual) (The universe for this measure is 56.)	Bob Mosher	Illinois EPA will continue to provide performance milestone information concerning the development of phosphorus and nitrogen water quality standards in an updated nutrient criteria development plan provided to USEPA no later than August 31, each year.	
		Bob Mosher	Illinois EPA will continue participation in the Regional effort to develop nutrient criteria guidance through its membership in the Regional Technical Assistance Group.	
		Bob Mosher	Coordinator will work with the Science Committee of the Nutrient Standards Workgroup.	
		Bob Mosher	Will also help in the analysis of data currently being collected by Illinois EPA's Monitoring Unit and organize meetings of the Science Committee.	
WQ03a	Number and national percent of States & Territories that within the preceding 3 year period, submitted now or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.	Bob Mosher	Consistent with the requirements of 40 CFR 131.20(c) where Illinois EPA proposes new or revised criteria that differ from USEPA's recommended criteria or for parameters where there are no USEPA recommended criteria, Illinois EPA will provide technical documentation for the decision it makes with respect to selecting data for use in calculating the criteria. Where USEPA national criteria exist, Illinois EPA will announce in its annual program plan, beginning in FY13, what standards, such as ammonia, human health narrative, bacteria, it will seek to update through the Illinois Pollution Control Board.	
	Human Health Criteria	Bob Mosher	Illinois EPA will propose updated human health criteria within the triennial review period beginning in FY13.	



	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Bob Mosher	Illinois EPA will propose an update for bacteria standards to the Illinois Pollution Control Board within three years of final adoption by USEPA.	
	Great Lakes Initiative Clearinghouse	Bob Mosher	If any criteria applicable to the Great Lakes are updated, IEPA will send USEPA completed criteria templates and fact sheets for upload to the GLI Clearinghouse.	
	Endangered Species Act Consultation	Bob Mosher	Illinois EPA will assist USEPA in coordinating with U.S. Fish and Wildlife Service on draft and final new and revised water quality standards.	
		Roy Smogor Bob Mosher Scott Twait	Lower Des Plaines River & Chicago Area Waterway UAA Illinois EPA will continue to support completion of the rulemaking and will actively work with USEPA to address concerns raised on proposed rules.	
WQ05	Number of States & Territories that have adopted and are implementing their monitoring strategies in keeping with established schedules. Status of Illinois' monitoring strategies and other initiatives	Gregg Good	<u>Ambient Water Quality Monitoring Network</u> – Illinois EPA will conduct monitoring activity at 146 ambient stream stations nine times annually (approximately every six weeks).	
		Gregg Good	<u>Intensive Basin Surveys</u> – Illinois EPA will conduct Intensive Basin Survey monitoring activities at approximately 125-140 sites annually. Major river basins planned to be monitored in FY12 include the Pecatonica, Fox, LaMoine, Kaskaskia, and Little Wabash. River basins planned to be monitored in by FY13 include the Rock, Des Plaines, Sangamon, and Big Muddy.	
		Gregg Good	<u>Facility-Related Stream Surveys</u> – Report the number of lakes/stations surveys conducted. Illinois EPA will conduct 5-10 facility-related stream surveys annually.	
		Gregg Good	<u>Ambient Lake Monitoring Program</u> – Report the number of lakes/stations sampled. Illinois EPA will conduct monitoring activity at approximately 35-45 inland lakes annually.	

		Gregg Good	<u>Volunteer Lake Monitoring Program (VLMP)</u> – Report the number of lakes monitored by volunteers along with a brief status on key accomplishments of the program. Illinois EPA will conduct VLMP Tier 1 monitoring at approximately 150-160 inland lakes and Tier 2 monitoring at approximately 40-50 inland lakes annually.	
		Gregg Good	<u>Fish Contaminant Monitoring Program</u> – Report the number of samples processed Illinois EPA and the number of stations sampled by IDNR. Illinois EPA will work cooperatively with the IDNR, IDPH, and IDOA to collect fish from approximately 75-85 waterbody stations, analyzing a total of approximately 375-425 fish contaminant samples annually.	
		Gregg Good	<u>Special Surveys</u> – Report the number of special surveys conducted. Special surveys are periodically conducted on an as-needed basis to meet lakes, NPS/watershed, permitting, or other program needs. The number and brief summaries of special surveys conducted by the Agency will reported on an annual basis.	
		Gregg Good	<u>Lake Michigan Monitoring Program</u> – Illinois EPA will conduct lake Michigan near shore survey monitoring at 25 probabilistically-based sites on an annual basis. If time and resources allow, 2-3 Lake Michigan harbors, and 3-4 public water supply intake locations, will be monitored annually.	
		Gregg Good	<u>Wetland Assessments</u> - Wetlands assessment commitment: Upon completion of the Wetland Index of Biotic Integrity (w-IBI) developed by the Illinois Natural History Survey (INHS), the Agency agrees to work with INHS and Region 5 to see how best to incorporate the w-IBI into a methodology to assess attainment of wetland use(s) in the 2014 Section 305(b) report.	
		Gregg Good	<u>National Aquatic Resource Surveys</u> – Illinois EPA will participate in the National Lakes Assessment survey with monitoring to take place in Summer 2012. Illinois EPA will make a commitment by approximately September 2012 whether it will participate in the National Rivers and Streams Assessment with monitoring to take place in Summer 2013.	

		Gregg Good	STORET – Illinois EPA will continue to submit regular updates of water quality information to STORET via the AWQMS database.	
		Gregg Good	<u>Water Quality Monitoring Strategy Development 2013-2018</u> – In developing the 2013-2018 Illinois Water Monitoring Strategy, consideration will be given to comments provided by USEPA on Illinois EPA’s previous strategy; new state and federal priorities; availability of Illinois EPA staff and financial resources; technical capabilities; etc. Region 5 and Illinois EPA will work together to develop a draft of the strategy which will be submitted to USEPA for review and comment by April 30, 2013. USEPA’s review comments will be provided back to IEPA by June 30, 2013. The final strategy will be developed by September 30, 2013.	
		Gregg Good Roy Smogor	By September 30, 2012, Illinois EPA will make an assessment of the resources necessary to run a level 4 biological assessment program. By June 30, 2013, Illinois EPA will inform Region 5 whether it will fully commit to development of a TALU-based monitoring, assessment, and implementation program in Illinois. If the Illinois EPA commits to doing so, a plan of action with milestones will be drafted and forwarded to Region 5 by September 30, 2013.	
WQ-07	Number of States and Territories that provide electronic information using the Assessment Database version 2 or later 9 or compatible system) and geo-reference the information to facilitate the integrated reporting of assessment data.	Gregg Good Amy Walkenbach	While acknowledging that the statutory date for submittal of the 305(b) report is April 1, Illinois EPA will provide the draft report, including a populated Assessment Database and geo-reference data, for review and comment by Region 5 and the public by April 1, 2012. The final report will be submitted for USEPA approval by June 30, 2012. For the 2014 cycle, Illinois EPA will implement procedural and scheduling changes in 2013 that will result in a submittal of the 2014 305(b) report to Region for approval by April 1, 2014	
	303 (d) List Development	Amy Walkenbach	<u>303(d) submittal</u> - The draft 303(d) list will be provided to Region 5 and the public for review and comment by April 1, 2012. The final Draft list will be submitted to Region 5 for approval by June 30, 2012.	

WQ-08b	Number and national percent, of approved TMDLs, that are established by States and approved by USEPA [state TMDLs] on a schedule consistent with national policy.	Amy Walkenbach	Continue watershed based TMDLs according to the request for proposal (RFP).	
		Amy Walkenbach	Deliver a schedule to Region 5 by September 15 of each year, of final TMDLs to be submitted for approval by Region 5 in each subsequent FFY.	
		Amy Walkenbach	Illinois EPA will address 135 segment impairments through completed TMDLs, new accountability projects, SP-11 delistings and reassigned Cat 5 impairments to Cat 4b and Cat 4c. Any other delistings resulting in impairments being removed from Category 5 will be taken from the universe of TMDLs needed and the proportional annual reduction equivalent to 1/13 of a TMDL, applied to the annual segment-impairment commitment of 125. It is the intent of Illinois EPA to address 75 segment-pollutant combinations through TMDL development.	
		Amy Walkenbach	Provide draft TMDLs to Region 5, 30-60 days prior to public notice, or alternate timeframe as agreed upon, for review and comment.	
		Amy Walkenbach	Illinois EPA will work with Region 5 to make TMDL process in Illinois more efficient and to ensure that Illinois EPA remains on pace in TMDL development.	

WQ-14a and WQ-14b	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements. WQ-14b Number categorical industrial users that discharger to POTWs with non-approved programs.	Roger Callaway	Illinois EPA will enter required data elements into ICIS. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are entered into ICIS. NPDES for annual reports submitted by POTW with approved pretreatment programs. By October 15, 2011, Illinois EPA will provide Region 5 a list of potential categorical and significant industrial users. Region 5 will send letters to industries subject to categorical standards informing them of their responsibilities under the pretreatment rules. Beginning October 1, 2011, Illinois EPA, shall, as a permit condition, require all major municipal permittees without approved programs to identify and report to the Region the number of categorical and significant industrial users they serve. Also, by December 15, 2011, Illinois EPA and Region 5 would work together to finalize a letter that would be sent to minor municipal permittees requiring them to identify and report to the Region 5 the number of categorical and significant industrial users they serve.	
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	Roger Callaway	Maintain major quarterly compliance rate at >=%95. Annual rate will meet or exceed the national goal.	
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	
		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	
Clean Water Action Plan	Resolve State Review Framework items	Bruce Yurdin	By October 15, 2011, U.S.EPA and Illinois EPA will meet to discuss and by December 15, 2011, Illinois EPA will develop a plan for the completion of inspection reports which includes appropriate guidelines, procedures and oversight. The Illinois EPA will follow the national Compliance Monitoring Strategy (CMS) for inspections and will meet the commitments as resources allow.	

	EPA/State permitting and enforcement joint work plan	Sanjay Sofat	U.S. EPA and Illinois EPA, working together, will conduct an annual Clean Water Act planning process. The purpose is to identify and discuss national, regional and state priorities in the context of available resources at both the state and federal levels. The result will be development of a Joint Work Plan consistent with CWA Action Plan guidance to be concluded no later than September 30th. The resulting collaborative annual work plan may include various mechanisms to get work done, such as work sharing, innovative approaches to monitoring facilities or addressing violations. Illinois EPA and EPA will implement the workplans consistent with the timeframes identified in the plans.	
Clean Water Acton Plan	Address Minor "Serious" Violators	Roger Callaway	Review non-compliance reports in response to significant violations. Select appropriate Enforcement Response	
		Roger Callaway Bruce Yurdin	Take appropriate compliance and enforcement actions in accordance with the Illinois EPA's Section 31 of the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations.	
		Roger Callaway	Review and update "Watch Lists" on a quarterly basis	
		Roger Callaway	Single event violation (SEVs) entry will be performed along with the entry of major inspections.	
		Roger Callaway	CSO notifications from municipalities will be entered into ICIS. An approach to tracking SSO notifications will be identified as part of the CSOs strategy that Illinois EPA proposed.	
		Roger Callaway	Illinois EPA will expand the use of electronic reporting to include additional facilities as well as additional types of reports received from wastewater facilities.	
		Bruce Yurdin	Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.	
	Permit Activities	Al Keller	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY12/13.	

WQ-12a		Al Keller	The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Because of issues raised on nutrient limits based on the Illinois narrative standard and 316(a) thermal demonstrations, Illinois EPA commits that 85% of majors will be current and 80% of minors will be current. Illinois EPA and Region 5 commit to identifying an approach on nutrient limits based on the narrative standard by October 1, 2011 (implementation upon agreement on an approach); EPA meeting its goal of reviewing selected proposed permits within 30 days; and to resolving concerns on three thermal demonstrations by March 1, 2012. Agreement on an approach to implement nutrients limits, resolution of thermal permit issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current and 90% of minor permits will be current".	
WQ-13a		Al Keller	<u>Stormwater</u> – Illinois EPA has reissued the construction site activity, industrial site activity and MS4 stormwater general permits. Illinois EPA will monitor any new federal regulations concerning these permits (i.e., effluent guidelines for construction site activities, new MS4 requirements, flow rate related restrictions) and modify the permits as necessary.	
WQ-19a	Number of high priority state NPDES permits that are issued in the fiscal year.	Darin LeCrone	Develop new priority permit lists for FFY2012 and 2013 and submit it to Region 5 by August 31 of each year. Issue 100% of the identified priority permits by the end of each FFY.	
		Al Keller	<u>Lagoon General Permits</u> – Illinois EPA will submit the 3 general permits for municipal and semi-public lagoon facilities to Region 5 for approval by October 1, 2011. After approval by Region 5, Illinois EPA will public notice the permits for subsequent issuance as soon as possible.	
		Al Keller	<u>Permit Backlog List</u> – Illinois EPA will submit a list of major or general permits, expired and expiring, for reissuance by August 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify	

			permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	
		Al Keller Patrick Kuefler	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice.	
		Al Keller	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility which includes an expansion of a facility.	
		Al Keller	Finalize and propose Sludge Regulations adoption during FFY13.	
		Al Keller	Develop a nutrient permitting strategy based on narrative standards by October 1, 2011. Implement the strategy in permit issuances and reissuances beginning in October 2011.	
			Illinois EPA will continue to work with Region 5 to conduct a Reasonable Potential Analysis for nutrients for the MWRDGC facilities	
			Within 90 days of Region 5 completing a Reasonable Potential Analysis for nutrients for the MWRDGC facilities, Illinois EPA will propose draft permits for the Stickney, Northside and Calumet WRPs consistent with the analysis.	
Clean Water Action Plan - Permitting for Environmental Results	Extend scope of current permits to ensure WET testing requirements	Bob Mosher	Determine protocol for deciding when more monitoring or limits is necessary for chronic WET by March 15, 2012.	
	Confined Animal Feeding Operation (CAFO) Work Plan	Dan Heacock	<u>CAFO rulemaking</u> Illinois EPA will submit the proposed amended CAFO rule and supporting regulatory package to the Illinois Pollution Control Board. .	
		Bruce Yurdin	<u>CAFO Inventory</u> By December 1, 2011, Illinois EPA will provide an inventory of large CAFOs to EPA. By December 1, 2012, Illinois EPA will provide a final inventory to EPA as a	



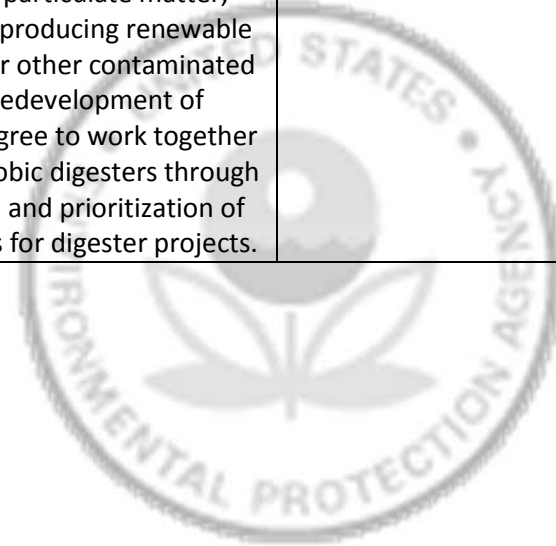
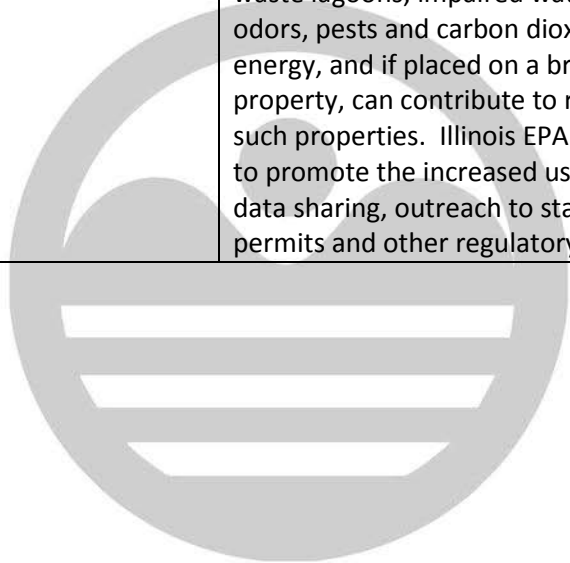
			basis for the final Work Load Assessment. The inventory at a minimum should identify facility name and location, owner/operator contact information, types and number of animals. By September 30, 2013, Illinois EPA will provide an updated CAFO inventory that contains the information identified in its plan to create and maintain a comprehensive inventory of CAFOs.	
		Bruce Yurdin	<u>CAFO Inventory Update</u> By December 1, 2012, Illinois EPA will provide an update to the CAFO inventory, adding any newly identified CAFOs and/or removing facilities determined not to be large CAFOs. Illinois EPA and EPA will discuss recommended changes to the content of the inventory prior to the December 2012 update.	
		Bruce Yurdin	<u>CAFO Work load Assessment</u> Six months after the final inventory has been completed, Illinois EPA will provide a final workload assessment based on the CAFO inventory developed per the Work Plan and that incorporates responses to EPA comments on Illinois' August 2011 preliminary workload assessment.	
		Dan Heacock	<u>CAFO Training</u> Newly hired Illinois EPA CAFO permit writers will complete an USEPA approved NPDES training program for permit writers within 6 months of start date. Existing EPA CAFO permit writers will complete USEPA approved nutrient management training, subject to availability of USEPA provided training. USEPA will train newly hired permit writers within 6 months of start date.	
		Dan Heacock	<u>CAFO permit reviews</u> 100%of permit applications received by March 31, 2012 will be acted on in accordance with Illinois EPA's SOP for CAFO applications.	
		Dan Heacock	<u>Incomplete CAFO Permit applications</u> - If Illinois EPA refers CAFOs to USEPA for incomplete applications, USEPA will issue information collection orders within 60 days of a referral from Illinois EPA.	
			<u>CAFO Permit Application Tracking</u> Illinois EPA will maintain a CAFO permit tracking system. By the 27 <sup>th</sup> day of every even numbered month Illinois EPA will submit an updated version	

			of the CAFO Tracker indicating current progress made on permit application reviews and final permit actions.	
		Dan Heacock	<u>CAFO rulemaking</u> Within 45 days after amendatory rulemaking becomes effective, will submit the final amendments to U. S. EPA for action under 40 CFR 123.62	
		Dan Heacock	<u>Inform CAFOs of amended CAFO rule and permit requirements</u> Within 30 days after publication of the amendments, Illinois EPA will inform the owners of each Large CAFO in the state's inventory, in writing, about the need for an NPDES permit for discharges from the CAFO and the consequences for failing to obtain the permit. Illinois EPA will provide a draft of the letter to U. S. EPA for review and approval.	
			<u>Revise permit application</u> Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will revise its permit application forms, as appropriate, based on the amendments and federal regulations.	
			<u>Propose general permit revisions</u> Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will formally propose for public review and comment draft modifications to the general permit ILA01, as appropriate, based on the amendments and federal regulations.	
		Bruce Yurdin	Illinois EPA will enter and maintain inventory of large and medium CAFOs in the Integrated Compliance Information System (ICIS) to the extent that ICIS protocols allow.	
		Bruce Yurdin	Perform an additional 25 NPDES evaluations by 6/1/2012 and provide U.S. EPA a copy of the final reports.	
		Bruce Yurdin	By September 1 of each year, Illinois EPA will develop an annual site-specific CAFO inspection plan which ensures NPDES inspection at a minimum of 20% of all permitted CAFOs, consistent with U.S. EPA's National NPDES Compliance Monitoring Strategy.	
		Bruce Yurdin	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum Within six months of their start date, and prior to conducting inspections independently	

		Bruce Yurdin	All staff working on AFO/CAFO issues will be trained on the revised ERG.	
		Bruce Yurdin	Issue VNs for all significant noncompliance detected at CAFOs, within 180 days of Illinois EPA becoming aware of the alleged violation, pursuant to Section 31(a) of the Illinois Environmental Protection Act (Act).	
		Bruce Yurdin	If Illinois EPA is unable to negotiate an acceptable CCA within 120 days of issuing the VN, Illinois EPA will refer the matter to the Illinois Attorney General's office, States Attorney's office or U.S. EPA.	
		Bruce Yurdin	For conditions that constitute an imminent or substantial endangerment to human health, the environment or property, immediately refer the matter to the Illinois Attorney General's office pursuant to Section 43 of the Act.	
		Bruce Yurdin	In cases where the facility does not respond to the VN or proposes a remedy that is less effective than the remedy proposed by Illinois EPA, Illinois EPA will immediately complete the necessary actions under Section 31 that will allow Illinois EPA to formally refer the matter to the Illinois Attorney General's office or the State's Attorney of the county in which the alleged violation occurred. Simultaneously, Illinois EPA will refer the case to its existing Enforcement Decision Group for pre-referral consideration of the case.	
		Bruce Yurdin	Illinois EPA program and legal managers, Illinois Attorney General's office managers, and U.S. EPA program and legal managers will conduct a quarterly docket review of all referred CAFO matters and all open federal enforcement cases.	
		Bruce Yurdin	Starting October 2011, Illinois EPA will provide a bi-monthly report to the U.S. EPA Water Enforcement Branch. The report will reflect the activities completed during the preceding two month and include element specified in the Illinois CAFO work plan.	

	Supplemental Section 106 Funding workplan	Bruce Yurdin	Illinois EPA did hire two (2) new FTEs in 2011 to complete this Proposal. The new FTEs will be trained in the responsibilities of an Illinois EPA inspector and in the appropriate federal and state laws and regulations governing CAFOs, equipped with the appropriate data collection and recordkeeping tools, and assigned the duty of specific CAFO inspections within a designated region of the state, as described above. The FTEs will conduct CAFO inspections and identify water quality problems, including the location, type and content of all wastewater discharges. It is anticipated that the 80 annual inspections will add to the approximately 220 livestock inspections that are annually conducted. High priority for inspections will be given to unpermitted CAFOs and to emergencies at CAFOs, including those that result in unauthorized discharges and those that endanger public health and the environment.	
	Inspections	Bruce Yurdin	<u>Inspection strategy</u> – An inspection plan will be sent to Region 5 by September 30 and will include projections for each year and consistency with EPA’s National Compliance Monitoring Strategy (CMS). Region 5 will comment on the Illinois EPA plan 30 days after submittal.	
		Bruce Yurdin	<u>Frequency of inspecting majors</u> – Majors with good compliance history will be reduced. A specific list and schedule of majors to be inspected will be sent to Region 5 by September 30 <sup>th</sup> of each year.	
		Bruce Yurdin	<u>Reconnaissance inspections</u> – Recon inspections will continue, as resources allow.	
		Bruce Yurdin	<u>Stormwater inspections in conjunction with SWCDs</u> - Agreements are in place with the SWCDs. These agreements govern to operations of this inspection and technical assistance program.	
		Bob Mosher	Illinois EPA will continue to implement the elements of the nutrient plan.	

	Work towards science-based standards (nutrients, bacteria, boron, fluoride, manganese) and more accurate use of classifications.	Bob Mosher	Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates for mutual agency agreement, as needed each summer if there has been slippage to major milestones in the plan.	
Joint Priority	Promote the use of anaerobic digesters in Illinois	Marcia Willhite	Anaerobic digesters are used to break down organic wastes and convert them into heat and methane gas, which can then be used to produce electricity. Digesters can be used to manage agricultural wastes to address problems with waste lagoons, impaired water quality, particulate matter, odors, pests and carbon dioxide, while producing renewable energy, and if placed on a brownfield or other contaminated property, can contribute to reuse and redevelopment of such properties. Illinois EPA and EPA agree to work together to promote the increased use of anaerobic digesters through data sharing, outreach to stakeholders, and prioritization of permits and other regulatory approvals for digester projects.	



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY  
DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)**

**Fiscal Year 2012-2013**

**(October 1, 2011 to September 30, 2013)**

Not all State Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Resource shortfalls have occurred as the regulations, mandated by the Safe Drinking Water Act (SDWA), come into effect.

Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the SDWA is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

To that end, Region 5, in cooperation with our State program partners, has developed a program plan that includes all of the major activities required by primacy regulations and primary drinking water regulations, to guide annual workplan and/or EnPPA discussions leading to annual grant commitments and work-sharing agreements. The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. For instance, in a state where radionuclides are prevalent, the state may need to devote proportionately more resources to implementing that regulation than another state, where arsenic is more prevalent.

Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of State programs are listed in the table. Priority activities are flagged throughout the ARDP (denoted with a triangle ►), which will be tracked more than once per year.

The State and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the State and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both State and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.

- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

## **PUBLIC WATER SYSTEM SUPERVISION PROGRAM**

### ***CORE STATE ACTIVITIES***

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent State decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.<sup>1</sup>
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

<sup>1</sup> States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

**CORE R5 ACTIVITIES**

Respond to questions from our state programs about regulations. Train state staff about treatment regulations by offering in-state and/or regional training opportunities.

Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.

- ▶ Track primacy submittal/review for all rules and provide comments on draft rules, as requested.
- ▶ Determine whether primacy applications are complete and determine tracking required for new rules by state.

Assist states in acquiring resources to carry out all functions of the PWSS program.

Monitor specific regulations related to State follow-up to the findings of the last data and enforcement verification reports, as indicated in the “R5 Activities” column.

<b>Acronyms/Abbreviations</b>	
ACS – Annual Commitment System	MRDL – Maximum Residual Disinfectant Level
ARDP – Annual Resource Deployment Plan	NCWS – Non-Community Water System
As – Arsenic	NPDWR – National Primary Drinking Water Regulation
CCR – Consumer Confidence Report	NTNCWS – Non-Transient Non-Community Water System
CFR – Code of Federal Regulations	OCCT – Optimal Corrosion Control Treatment
CPE – Comprehensive Performance Evaluation	pCi/L – picoCurie per liter
CTA – Comprehensive Technical Assistance	PN – Public Notification
CWA – Clean Water Act	ppb – part per billion
CWS – Community Water System	PWS – Public Water System
DBP – Disinfection By-Products	PWSID – Public Water System Identification
D/DBPR – Disinfectants and Disinfection By-Products Rule	PWSS – Public Water System Supervision
DWA – Drinking Water Academy	Rads – Radionuclides
DWSRF – Drinking Water State Revolving Fund	RTC – Returned to Compliance
eDV – Electronic Data Verification (Tool)	SDWA – Safe Drinking Water Act
EnPPA – Environmental Performance Partnership Agreement	SDWIS/FED – Safe Drinking Water Information System/Federal
ERG – Expense Reimbursement Grant	SDWIS/State – Safe Drinking Water Information
ERP – Enforcement Response Policy	



<p>ETT – ERP Enforcement Targeting Tool          FBRR – Filter Backwash Recycling Rule          GWR – Ground Water Rule          GWS – Ground Water System          GUDI – Ground Water under the Direct Influence of Surface Water          HAA5 – Haloacetic Acids          HSA – Hydrogeologic Sensitivity Assessment          IDSE – Individual Distribution System Evaluation          IESWTR – Interim Enhanced Surface Water Treatment Rule          IOC – Inorganic Contaminant          IUP – Intended Use Plan          LCR – Lead and Copper Rule          LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule          LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule          MCL – Maximum Contaminant Level          M/R – Monitoring/Reporting</p>	<p>System/State          SNCs – Significant Non-Compliers          SOC – Synthetic Organic Contaminant          SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation          SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager          Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule          SWAP – Source Water Assessment Program          SWP – Source Water Protection          SWTR – Surface Water Treatment Rule          TCR – Total Coliform Rule          TMDL – Total Maximum Daily Load          TT – Treatment Technique          TTHM – Total Trihalomethanes          UCMR – Unregulated Contaminant Monitoring Rule          V&amp;E – Variances and Exemptions          VOC – Volatile Organic Contaminant          WBDO – Waterborne Disease Outbreak          WQP – Water Quality Parameter</p>
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**Attachment B: Unregulated Contaminant Monitoring Rule  
(UCMR) Partnership Agreement**

Illinois Environmental Protection Agency

U.S. Environmental Protection Agency Region 5

PARTNERSHIP AGREEMENT for the IMPLEMENTATION of the  
UNREGULATED CONTAMINANT MONITORING REGULATION (Cycle 3)

**BACKGROUND**

The goal of the Unregulated Contaminant Monitoring Regulation (UCMR) under the Safe Drinking Water Act (SDWA) is to obtain reliable data concerning the occurrence of unregulated contaminants in drinking water as one step to determine whether or not to regulate them. The EPA is to make this determination in a public process with input from States and other stakeholders. Since EPA and the States and Tribes are partners in the implementation of any future regulations associated with these contaminants, they have a joint and mutual interest in obtaining the best data possible through the monitoring program under the UCMR.

EPA is proposing to require all public water systems (PWSs) serving more than 10,000 people, and a representative sample of 800 PWSs serving 10,000 or fewer people, to conduct Assessment Monitoring (List 1) for 28 chemicals during a 12-month period from January 2013 to December 2015. As under previous cycles of the UCMR, EPA would continue to conduct and pay for the monitoring required for those selected PWSs serving 10,000 or fewer people. As proposed, UCMR3 does not include any contaminants to be monitored in a Screening Survey (List 2). If the final UCMR3 does not include a Screening Survey, then the State will not need to perform any tasks in this Partnership Agreement pertaining to the List 2 monitoring. Additionally, 800 small vulnerable nondisinfecting groundwater PWSs serving 1,000 or fewer people will be required to conduct the Pre-Screen Testing (List 3) for 2 virus contaminants and 5 indicator variables. Since this monitoring requires specialized sampling and is only being conducted at small systems, the EPA's Office of Ground Water and Drinking Water (OGWDW) will coordinate the monitoring at the selected sites. The Pre-Screen Testing will be conducted during a 12-month period between January 2013 and December 2015.

States have requested to assist the EPA in implementation of this regulation through a "memorandum of agreement," which is represented by this Partnership Agreement (PA). Consistent with the flexibility provided by the SDWA, the revised UCMR is not to be adopted by each State or carried out as part of each State's primacy responsibilities. However, there are specific responsibilities that a State could carry out as part of a PA with the EPA to ensure that the national database receives the best information on unregulated contaminants for future regulatory efforts. As a result, the EPA has developed this model PA. The PA will be used by the EPA Regional Offices and the States to establish the extent to which the State will participate in the preparation for and the implementation of the UCMR.

**PURPOSE**

This PA is intended to support the implementation of the UCMR by identifying the key implementation activities which will be performed by the State for the third UCMR monitoring cycle (UCMR3). While States are not responsible for implementing the UCMR, the Association of State Drinking Water Administrators (ASDWA) and the EPA encourage States to assist the EPA to the extent feasible as the activities in this PA are

implemented. The principal agent within the EPA's OGWDW charged with implementation responsibility for the UCMR is the Technical Support Center (TSC), located in Cincinnati, Ohio. A key role of the EPA Regional Office is to establish an agreement with States; identifying what each State will do to implement specific provisions of the regulation. The extent to which the State engages in implementing the UCMR jointly with the EPA will depend on many considerations. If a State wishes to participate in UCMR implementation, the State must agree to carry out the review of the initial State Monitoring Plan, as provided in Section 1445(a)(2)(C)(I) of SDWA. This role is provided in Part 1, Necessary Responsibilities, of the attached agreement. The State may elect to assume additional responsibilities over and above those identified in Part 1 in assisting the EPA's direct implementation responsibility for the UCMR. These other responsibilities are identified in Part 2, Supplemental Responsibilities. These are to be determined through discussions between Regions and each State.

To implement the UCMR in an orderly and timely fashion, this PA must be signed by **June 30, 2011**. If it is not signed by that date, it will be assumed that the State is not partnering with the EPA to implement the UCMR3.

#### RATIONALE

The basis for this PA to implement the regulations at 40 CFR 141.35 and 141.40 is Section 1445(a)(2)© of the SDWA and the expressed desire of States to support the EPA's receipt of high quality data through their participation. Specifically, States indicated their desire to work with public water systems concerning their monitoring responsibilities and generally expressed a willingness to assist the EPA in implementing the UCMR.

#### LIMITATIONS

All commitments made in this PA are subject to the availability of funds. The parties agree that they will bear their own cost of participation in the PA.

This PA does not create any right or benefit, substantive or procedural, against the parties, their officers or employees, or any other person.

#### MODIFICATION NOTIFICATION

If for whatever reason the State will not be able to complete any task agreed to in this PA, the State should notify the Technical Support Center and the relevant EPA Regional Office as soon as possible to avoid confusion and implementation delays.

### **UCMR IMPLEMENTATION: ROLES AND RESPONSIBILITIES**

The tasks listed below identify activities that may be carried out by the State under the PA. The list is organized in two parts that address, respectively, necessary and supplemental activities. If a State desires to enter into a PA, the State must agree to review the SMP, with the option to provide assistance with the other responsibilities in Part 2. Part 2 has important functions to be undertaken which may be most effectively performed by the State.

Please place a mark next to each activity for which the State will take responsibility.

Part 1 - Necessary Responsibilities

1.  Review the draft State Monitoring Plan (SMP) to verify proper classification of public water systems (PWSs). The SMP is a comprehensive list of community and nontransient, noncommunity water systems, including: 1) all large PWSs (serving >10,000 persons), and EPA-selected small PWSs (serving <10,001 persons) that must conduct Assessment Monitoring; 2) all EPA-selected small PWSs that must conduct the Pre-Screen Testing; and possibly 3) all very large PWSs and EPA-selected small and large PWSs that must conduct Screening Surveys. The SMP must be returned to the EPA/TSC within 60 days of receipt of the draft SMP.

Part 2 - Supplemental Responsibilities

2.  Provide (or ensure) the proper PWS inventory data (PWSID, facility ID and sample point ID) for each PWS to use for reporting their monitoring data in the Safe Drinking Water Accession and Review System (SDWARS). This may include initially providing the complete inventory and correcting or adding facilities and/or sample points, when necessary.
3.  Review representative sampling plans for reduced monitoring submitted by PWSs with groundwater sources that have multiple entry points to the distribution system. Inform the EPA of the State's approval, modification, or disapproval. **If the EPA does not receive your recommendation within 60 days of your receiving the PWS's proposed representative groundwater wells monitoring plan, then the EPA will assume State concurrence.**
4.  Notify large PWSs of their Assessment Monitoring and/or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify large systems.**
5.  Notify small PWSs that are part of the final SMP of their Assessment Monitoring or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify small systems.**
6.  Notify the EPA/TSC at least 6 months before monitoring is to occur that the State will perform the sampling for the small PWSs in the SMP for Assessment Monitoring and/or Screening Surveys. **If the EPA does not hear from you by this deadline, then the EPA will assume the PWSs will perform the sampling.**
7.  Specify an alternate monitoring date, if the State is going to collect samples for small PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**
8.  If the State is going to collect large PWSs samples, assign the monitoring schedule for the large PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**

9. \_\_\_ Assist the EPA in obtaining compliance through follow-up contact with PWSs concerning their monitoring responsibilities and concerning instances of noncompliance.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.1 – Adopt all rules in a timely manner (within two year extension period).</p> <p>Issue: “There are concerns that the emerging technologies associated with LT2SWTR (ultraviolet light disinfection and membrane filtration specifically) are increasingly difficult due to their complexity and lack of staff capable of devoting sufficient time to study the issues.</p> <p>Additional staff in the Permit Section is desirable to devote adequate resources to them.”</p> <p>The state has identified this issue in their 2010 Joint Evaluation and will discuss alternatives.</p>	<p>Illinois EPA has adopted the rules above and is implementing provisions of the rules thru inspections and providing training, technical assistance and taking enforcement actions as necessary.</p>	<p>Region 5 is currently processing the primacy approval for LT2/Stage2.</p>	
<p>1.2 – Notify all surface water and GUDI systems of their regulatory requirements.</p>	<p>Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.</p> <p>NCWS Monitoring schedules will be available on-line when IDPH has Drinking Water Watch up and running – projected date is the end of 2012.</p>	<p>As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.</p> <p><i>NOTE: The next update for SDWIS/State will contain compliance modules for Stage 2 and LT-2 rules.</i></p>	<p>Data is maintained in SDWIS/State.</p>		
<p>1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.</p>	<p>Data is maintained in SDWIS/State and will be used to update SDWIS/FED.</p>	<p>► R5 will evaluate extent to which LT2 violations are reported to SDWIS/FED.</p> <p>New Rule Violations as of April 2011 (2008-2010 data) – M/R – LT2 ESWTR - 1</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Illinois has committed to completing 95% of the surface water sanitary surveys under the national measures.</p>	<p>Provide training, as requested.</p> <p>► Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).</p> <p>As of April 2011 (2008-2010 data)</p> <p>CWS - 48 not completed, 528 completed, 576 total systems. 91.7%</p> <p>NTNCWS – 1 not, 6 completed, 7 total. 85.7%</p> <p>TNCWS - 1 not, 113 completed, 114 total. 99.1%</p> <p>This national measure will be finalized in July 2011. It will be measured again in July 2012 for the period of 2009 to 2011.</p>	



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system’s existing conventional or direct filtration system, or at alternate location approved by the State.</p>	<p>Replies have been received from all surface water supplies.</p>		
<p>1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.</p>	<p>Ongoing – will continue.</p>		
<p>1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.</p>	<p>Ongoing – will continue.</p>		
<p>1.9 – Follow-up on turbidity TT violations.</p>	<p>Ongoing – will continue.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	
<p>1.10 – Follow-up on individual filter turbidity M/R violations. a. Track</p>	<p>Ongoing – will continue. Tracked in SDWIS/State.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
individual filter turbidity trigger exceedances. <b>b.</b> Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.			
1.11 – When required, track the completion of CPE/CTA for PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
1.12 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Ongoing – will continue.		
1.13 – Follow-up on disinfection residual TT violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested	
1.14 – Follow up on disinfection residual M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested	
1.15 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller’s PWSID number for purchased surface water and purchased GUDI sources, etc.)	Ongoing – will continue. Tracked in SDWIS/State.		
1.16 – Ensure that disinfection profiling and benchmarking is conducted when required by rule.	Ongoing – will continue		
1.17 – Ensure that all required records are kept by surface water systems.	Ongoing – will continue.		
1.18 – Complete remaining GUDI determinations.	Ongoing – will continue		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
2.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.	Ongoing – will continue. Tracked in SDWIS/State		
2.3 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State		
2.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
2.5 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.  Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).	Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.  Groundwater Section staff are updating source water assessments and Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.		
2.6 – Follow-up on all M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.1 – Adopt the GWR in a timely manner (within two year extension period).	The IPCB adopted the GWR on 7/27/2007 and the Primacy Application was delivered to Region 5 on 11/3/2009.	The GWR has been reviewed and issues identified and sent to the State. State comments received and in the process of discussion.	
3.2 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	<i>States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality. The Illinois EPA has not yet encountered limitations.</i>	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Data will be tracked in SDWIS/State and transferred to SDWIS 3.0 when available.	<p>► Region 5 will evaluate extent to which GWR violations are reported to SDWIS/FED.<sup>1</sup></p> <p>New Rules: Violations as of April 2011 (2008-2010 data)</p> <p>M/R – GWR – 2 Other – GWR – 1</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by <b>12/31/12</b> at CWSs and then every 3 years thereafter, and by <b>12/31/14</b> at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p> <p>Issue: (same issues regarding staff resource as in LT2SWTR in 1.1)</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Reports will be made as resources allow.</p>	<p>► R5 will measure completeness of sanitary surveys within evaluation time period (three or five years).<sup>2</sup></p> <p>As of April 2011 (2008-2010) data</p> <p>CWS – 174 not, 992 completed, 1166 total. 85.1%</p> <p>NTNCWS – 11 not, 359 completed, 370 total. 97.0%</p> <p>TNCWS – 48 not, 2854 completed, 2902 total. 98.3%</p>	

Table 1. Primacy Activities


Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	Treatment will be required when necessary to ensure a multi-barrier protection strategy at all community water supplies in Illinois.		
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	IEPA is implementing a groundwater rule implementation strategy approved by Region 5. IDPH will implement the triggered source water monitoring requirements by the compliance date specified in the GWR.		
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	See 3.7 above.		
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ongoing – follow up actions will be taken as appropriate.		
3.10 – Follow-up on corrective action consultation and reporting violations.	Ongoing – follow up actions will be taken as appropriate.		
3.11 – Follow-up on M/R violations.	Ongoing – follow up actions will be taken as appropriate.		
3.12 – Follow-up on public notification violations.	Ongoing – follow up actions will be taken as appropriate.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ongoing – follow up actions will be taken as appropriate.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
4.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.	Ongoing – will continue. Tracked in SDWIS/State.		
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State.		
4.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
4.5 – Follow-up on M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).	IPCB has adopted the LCR short term and minor revisions and the rules are being implemented.  IDPH has submitted milestone data to the ODS and will continue updating data.	Provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012).	
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	IPCB has adopted the LCR short term and minor revisions and the rules are being implemented.		
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90<sup>th</sup> percentile action level sample data for all large and medium sized systems, and 90<sup>th</sup> percentile action level exceedance sample data for small systems.</p>	<p>Ongoing – will continue. Tracked in SDWIS/State.</p>	<p>Region 5 will finalize the LCR module of the compliance determination and violation reporting training (CDVRT).</p> <p>► Region 5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.<sup>1</sup></p> <p>New Rules: Violations as of April 2011 (2008-2010 data)</p> <p>M/R - LCR - 72</p> <p>► Region 5 will evaluate completeness of reporting LCR 90<sup>th</sup> percentile action level sample data.</p> <p>Report as of April 2011 (2008-2010 data) –</p> <p>CWS – 438 – 100% complete.</p>	
<p>5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.</p>	<p>Ongoing – will continue. Tracked in SDWIS/State.</p>		
<p>5.7 – Follow-up on all M/R violations.</p>	<p>Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	
<p>5.8 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.</p>	<p>Ongoing- will continue.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
5.9 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.		Headquarters to provide training to R5 states on setting appropriate optimal water quality parameter (OWQP) ranges in R5 office during Summer 2011.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted LT2 & Stage 2 rules and IEPA & IDPH are in the process of implementing the regulations.	Train state staff about Stage 2 D/DBPR by offering in-state and/or regional training opportunities. As noted in 5.1, provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012). EPA-HQ will provide a webinar in August 2011 on Stage 2 compliance, including transition issues.	
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	Region 5 will handle and close out all enforcement actions that we've initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	Data will be maintained in SDWIS/ State		
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State	Stage 2 Data Entry Instructions (DEI) was provided to the states on February 10, 2011. ▶ Region 5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED. <sup>1</sup>	
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.6 – Follow-up on all other MCL/MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.8 – Follow-up on all M/R violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Ongoing – will continue		
6.10 – Follow-up on all other reporting requirement violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
7.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted IOC Rules and they are being implemented (including arsenic).		
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.	Ongoing – will continue. Tracked in SDWIS/State.		
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
7.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
7.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted Radionuclide Rules and they are being implemented.	R5 plans to distribute a gross alpha holding time report by December 2011.	
8.2 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
8.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Ongoing – will continue.		
8.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
8.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
8.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOCs</b>			
9.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
9.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOCs.	Ongoing – will continue. Tracked in SDWIS/State.		
9.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
9.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
9.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>10.0 – VOCs</b>			
10.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>10.0 – VOCs</b>			
10.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.	Ongoing – will continue. Tracked in SDWIS/State		
10.3 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State		
10.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	
10.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	
Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>11.0 – Organic and Inorganic Chemical Monitoring Waiver Program</b>			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.	Changes to the approved program not needed during 2010.  Applicable system’s waivers will be evaluated during 2011 for the January 1, 2011 thru December 31, 2013 compliance period.		



Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>12.0 – Sodium</b>			
12.1 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
12.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.	Ongoing – will continue. Tracked in SDWIS/State.		
12.3 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	Ongoing – will continue.		
12.4 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			
13.1 – Notify all public water systems of their public notification requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
13.2 – Maintain a data base management system that accurately tracks PN violations.	Ongoing – will continue. Tracked in SDWIS/State		
13.3 – Electronically report all public notification violations to SDWIS/FED.	Ongoing – will continue.		
13.4 – Follow-up on all Tier 1, 2 & 3 violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>14.0 – CCR</b>			
14.1 – Notify all regulated water systems of their CCR requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Ongoing – will continue.		
14.3 – Electronically report all CCR violations to SDWIS/FED.	Ongoing – will continue. Tracked in SDWIS/State.		
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>15.0 – Laboratory Certification</b>			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the <u>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>Issue: “State travel restrictions continue to prevent the training of additional staff to provide back-up for conducting the on-site laboratory assessments”</p>	<p>Illinois does require that all laboratories be certified for SDWA sample result submission and certification occurs every two years. The laboratories are certified to NELAC standards which are equivalent to the EPA Manual. At this time, third parties are not being used to conduct on-site visits.</p>	<p>The Region will assess the State labs and the State certification programs in FY 2012.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p>	<p>IEPA and IDPH commit to participate in the November 28 – December 1, 2011, PWS program review for CWS &amp; NCWS.</p>	<p>R5 will conduct a PWS program review (formerly called data verification) in IL in late CY11. (scheduled for November 28 – December 1, 2011) -Review consists of CWS &amp; NCWS -Region 5 will provide State Target List and Questions prior to review.</p>	
<p>16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.</p>	<p>Ongoing – will continue. Tracked in SDWIS /State</p>	<p>Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.</p>	
<p>16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.</p>	<p>Ongoing – will continue.</p>	<p>Assist with enforcement referrals, analysis, and data clean up or other joint efforts as requested by state.</p>	


<p>16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.</p>	<p>Ongoing – Illinois EPA will continue to provide timely updates to USEPA-Region 5 requests.</p>	<p>Each quarter, Region 5 will send the states updated ERP reports requesting a state update. Region 5 will integrate State updates into reports before the next request is sent out.</p>	
<p>16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.</p>	<p>The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.</p>		
<p>16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2011 and June 2012.</p>	<p>Illinois now has legislation making Compliance Commitment Agreements enforceable. At this time, the impact of this legislation will be difficult to assess. Hence, Illinois EPA will commit to address and resolve 80% of the systems over the reporting period.</p>	<p>► Region 5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management</b>			
<p>17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p>	<p>IDPH will commit to completing the locational data for the 145 Non-transient and Transient Non Community source water system facilities.</p> <p>For each data submission with errors, the State will contact the Region about their plans for fixing the errors.</p>	<p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	
<p>17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.</p>	<p>Ongoing – will continue.</p>		
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p>	<p>Since data management is critical to each State’s ability to maintain primacy, the State shall send a representative to the annual ASDWA Data Management Users conference.</p> <p>Note: Item 17.3g has been Completed and data will continue</p>	<p>Region 5 is continuing to develop compliance determination and violation reporting training (CDVRT). The LCR CDVRT module is nearly complete. In addition, we are trying to obtain funding to complete the remaining modules.</p>	


<p>17.3b – State will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3e – The State will work with the Region to test/evaluate the eDV tool.</p> <p>17.3f – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State’s plans or schedule to use them including the eDV tool.</p> <p>17.3g – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p>	<p>to be updated.</p>		
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Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>18.0 – Annual Compliance Report</b>			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.	Illinois EPA will provide future reports by July 1 <sup>st</sup> of each calendar year.	OECA to provide annual ACR guidance. Region 5 will forward guidance when received.	
<b>19.0 – Variances and Exemptions</b>			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	This is not applicable to Illinois.		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals</b>			
20.1 – Gather information to track strategic plan progress.  State directors will attend the annual Region 5 state directors meeting in <b>April 2012</b> and <b>April 2013</b> to discuss primacy and implementation issues.	IEPA will report these measures through the PPA.	Compile information and report to HQ.  Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public	



Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals</b>			
		<p>understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.</p> <p>Region 5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.</p>	

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Preparing for Security Threats at PWSs</b>			
1.1 – State-specific security work plan activities.	Report work plan progress semi-annually.	<p>Review work plan updates.</p> <p>Hold quarterly conference calls with state security contacts.</p>	
1.2 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.	IEPA has planning documents in association with the Illinois Emergency Management Agency. Based upon resource limitation, sector specific plans may be evaluated in the future to augment existing plans.	Review state emergency water plans and consult with the state on implementation capabilities.	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
<p>2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.</p>	<p>Revise ERG workplan to reflect progress. Due Dates – September 30, 2011 and September 30, 2012</p> <p>Develop a fiscal plan as the ERG approaches the end of the budget period (December 31, 2012).</p>	<p>Coordinate information and issues on Op Cert Program implementation and annual reports as well as ERG progress.</p> <p>The ERG funds are to be expended within the existing grant end dates, and to help Region 5 states expend these funds within this timeframe, Region 5 staff will share information about successful state efforts to use ERG funds.</p>	
<p>2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators and (2) provide training and opportunities for upgrading and renewing certification for existing operators.</p>	<p>Ongoing – will continue.</p>		

<p>2.3 – Provide supplemental certification and training to water system operators on relevant topics from section 7.0 “Sustainable Infrastructure” of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.</p>	<p>Will coordinate with USEPA-Region 5 on this activity.</p>	<p>Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.</p>	
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Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.</p>	<p>IEPA will provide future reports by December 31 of each calendar year.</p>	<p>Region 5 will send a reminder to the State about the capacity development annual report in August 2011 and August 2012.</p>	
<p>3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.</p>	<p>IEPA will provide future reports to the governor as appropriate (next submittal is due by October 1, 2011).</p>	<p>Region 5 will send a reminder to the State about the report to the governor in August 2011.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
3.3 – Promote “Sustainable Infrastructure” activities as described in section 7.0 of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.	Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with states.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.1 – Update source water assessments, as resources allow.			

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).</p>	<p>SWP plan development and implementation will be achieved with assistance from the following SWC partners:</p> <p>Illinois EPA will continue to work with the IRWA and local stakeholder to encourage regulatory and non-regulatory protection programs.</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance.</p> <p>Encourage interstate communication through conference calls and an annual State-R5 EPA meeting.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012 on June 30, 2012 by August 15, 2012.</p>	<p>Groundwater Section staff are updating source water assessments and will evaluate the most efficient mechanism to report program measures to the USEPA-Region 5.</p>	<p>Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.</p>	<p>Illinois EPA continues to actively coordinate program activities between Clean and Safe Drinking Water Act program, both within the Bureau of Water. Such activities include coordination on Clean Water Act Section 319, Mine Program, NPDES and sludge application programs. Additionally, the Interagency Coordinating Committee and Groundwater Advisory Council continue to meet on a quarterly basis which brings together planning impetus with Agricultural and Resource based Agencies as well as Regulatory Program areas.</p>	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	Ongoing – will continue.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – DWSRF</b>			
5.1 – Implement all required activities.	Ongoing – will continue.	Review IUP and set-aside workplans. Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report</b>			
6.1 – Review the draft report prepared by Region 5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.	Illinois EPA will continue to coordinate with USEPA Region 5.	Use the logic model to improve our ability to understand measure, assess, and communicate progress. SPM will work with state program to determine state-specific approach, and schedule.	



Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – Sustainable Infrastructure</b>			
<p>7.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.</p>	<p>Illinois is piloting a small systems compliance grant program. This program is designed to provide financial capacity by awarding \$2 million in up to \$200,000 increments to several very small community water supplies. This grant program is being funded through DWSRF loan repayments. Upon culmination of this program, the effort will be evaluated for future use.</p>	<p>Participates in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>▶ Region 5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Environmental Justice</b>			
8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.	Ongoing – will continue.	Region 5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools as an interim screening approach.	
<b>OW ACS code</b>	<b>Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink</b>		
SDW-03	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. <b>This is an indicator that HQ reports.</b>		
SDW-04	In FY2012, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). <b>HQ reports.</b>		
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). <b>HQ reports.</b>		
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. <b>This is an indicator that HQ reports.</b>		
SDW-12	Percent of DWSRF dollars awarded to small PWSs serving <500, 501-3,300, 3,301-10,000 consumers. <b>This is an indicator that HQ reports.</b>		
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. <b>This is an indicator that HQ reports.</b>		
SDW-14	Number and percent of CWSs and NTNCWSs, including new PWSs, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). <b>This is an indicator that HQ reports.</b>		
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. <b>This is an indicator that HQ reports.</b>		
SDW-16	Average time for small PWSs (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). <b>This is an indicator that HQ reports.</b>		
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. <b>This is an indicator that HQ reports.</b>		

OECA ACS code	<b>Goal 5: Compliance and Environmental Stewardship</b> <b>Subobjective 5.1.2: Address Environmental Problems from Water Pollution</b>
5.1.2 (SDWA02)	During FY2012, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2011 ETT report.
<b>Measure</b>	<b>America's Children and the Environment, Third Edition (ACE3)</b> <b>Drinking Water Contaminants</b>
E6	Percentage of children served by CWSs that did not meet all applicable health-based drinking water standards. <b>This is an indicator that HQ reports.</b>
E7	Percentage of children living in areas served by CWSs with violations of drinking water monitoring and reporting requirements. <b>This is an indicator that HQ reports.</b>

