State of Illinois

2023 TRIENNIAL REPORT TO THE GOVERNOR

ON THE EFFICACY OF THE CAPACITY DEVELOPMENT STRATEGY AND PROGRESS IN IMPROVING THE TECHNICAL, MANAGERIAL, AND FINANCIAL CAPACITY OF PUBLIC WATER SYSTEMS IN THE STATE OF ILLINOIS For Fiscal Years 2021-2023

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PURPOSE OF THIS REPORT

This report is intended to meet the reporting requirements of Section 1420 of the federal Safe Drinking Water Act, which requires triennial reporting to the Governor on the effectiveness of Illinois' Capacity Development Strategy and progress in improving the Technical, Managerial and Financial Capacity of public water systems in Illinois.

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement, which can be found in Title 35 of the Illinois Administrative Code (ILL. ADM. CODE) Part 652 and Title 77 of the ILL. ADM. CODE Part 900.

Illinois also had to develop and implement a strategy to help all existing CWS and Non-Community Water Supplies (NCWS) achieve and maintain TMF capacity beginning October 1, 2000. Illinois submitted a Capacity Development Strategy for existing public water supplies in July 2000 to the United States Environmental Protection Agency (USEPA) and the Strategy was approved by the USEPA on September 27, 2000. Illinois submitted a Revised Capacity Demonstration Strategy in December 2022 and the final version of the strategy was approved by USEPA in May 2023.

In Illinois, the Illinois Environmental Protection Agency (ILLINOIS EPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) regulates NCWS systems.

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

INTRODUCTION

In Illinois, regulatory oversight of public water systems (PWS)[1] is shared by the Illinois EPA and DPH. The Illinois EPA was designated as Illinois' primary enforcement authority by the U.S. EPA on August 29, 1979. The Illinois EPA, through an Intergovernmental Funding Agreement has empowered the Illinois DPH to administer the Non-Community PWS Program while the Illinois EPA retains regulatory authority over Community PWS[2].

The Illinois EPA regulates 1,753 active CWS. These water supplies utilize groundwater and surface water sources of potable water. At this time, 1,133 CWS use groundwater sources, 620 use surface water sources or groundwater sources under the direct influence of surface water, and 755 supplies purchase

[1] PWS serve 15 service connections or 25 residents.
[2] CWS serve 15 or more year-round service connections or 25 or more year-round residents.

water from other CWS. A total of 12,057,572 persons are served by those systems. Thirty five percent of the population is served by purchased surface water, two percent by purchased groundwater, and 24 percent by groundwater systems. It is worth noting that although only 26 percent of the population is served by groundwater (including purchased groundwater), groundwater dependent systems comprise almost 65 percent of the total number of CWS.

The Transient Non-Community (TNC) PWS served a population of 296,178 in 2022, while NTNC PWS served a population of 161,457. A total of 387,790 persons are served by systems using groundwater, while only 69,847 persons are served by surface water. These numbers reflect the areas where NCPWS are located predominantly in rural or non-incorporated areas where groundwater is generally available as a source of potable water.

STATUTORY BACKGROUND

The program to protect PWS in Illinois began in 1915 and has undergone considerable legal and regulatory restructuring over the years. In 1970, the General Assembly formulated the Illinois Environmental Protection Act (Act), 415 ILCS 5. The regulations governing Community Water Supplies were later adopted by the Illinois Pollution Control Board and are codified in 35 Ill. Adm. Code Subtitle F. The Illinois Groundwater Protection Act (IGPA), 415 ILCS 55/1 was adopted in 1987. Additionally, programs to protect groundwater were initiated by the Act in conjunction with "Water Quality Standards" for waters of the state that included underground water (35 Ill. Adm. Code 302). In 1991, the Illinois Pollution Control Board adopted comprehensive groundwater quality (35 Ill. Adm. Code 620).

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

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

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

To support these areas of responsibility within the Non-Community PWS, Illinois DPH has field staff located in the Illinois DPH's six Regional Offices (RO) and leverages the resources of Local Health

Departments (LHD). Compliance assurance and engineering services are generally conducted by staff located in the Central Office in Springfield. Consistent with the requirements of the Safe Drinking Water Act (SDWA) program activities include sanitary surveys, water analysis and reporting; plan review; technical assistance; and training and education.

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

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

In 1998, the Illinois EPA began making CWS revolving loans through a partnership with the U.S. EPA and the Federal Government. Since this time, the Illinois EPA has made more than $2.3 billion in revolving loans to water systems. This money has gone to public water supply systems around the state to maintain compliance with federal and state laws and regulations and maintain and improve the state's drinking water infrastructure.

REPORTING REQUIREMENTS

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

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

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

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

OVERVIEW OF THE PWS PROGRAMS IN ILLINOIS

Community Public Water Supply Surveillance Program

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

The focus of the Illinois EPA's inspections of CWS continues to be an evaluation of the general operation and maintenance practices at the respective systems. Inspectors evaluate state regulations under 35 Ill. Adm. Code Subtitle F and various ancillary programs that affect the CWS, such as the regulations under the Title IV: Drinking Water Security and Safety of the *Public Health Security & Bioterrorism Preparedness & Response Act of 2002* (Public Act 107-188, June 12. 2002). Fundamental aspects of these inspections also revolve around the provision of technical assistance, identification of significant deficiencies and necessary corrective actions to ensure the safety of drinking water supplies. The engineering evaluations include an on-site review of the eight components of the sanitary survey, including source, treatment, distribution system, finished water storage, pumps, monitoring & reporting, management & operation, and operator compliance assessments. The DPWS conducts surveillance and inspections at CWS from six regional offices located in Rockford, Elgin, Champaign, Springfield, Collinsville and Marion.

With assistance of national stakeholder groups, the U.S. EPA has established that over the next two-year reporting cycle, state primary enforcement programs should complete sanitary surveys at a minimum of ninety percent (80 %) of the CWS in their state on a 3-year frequency rather than the eighty percent (80%) goal from previous reporting periods. In 2022, the Illinois EPA conducted 528 sanitary surveys, which was 90% of the total systems to be inspected for 2022. For the reporting period (2020-2022), the Illinois EPA has conducted sanitary surveys at approximately 77.31% percent (1,339 of 1,753) of the CWS under its regulatory authority.

Non-Community Public Water Supply Surveillance Program

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

Illinois DPH Policy sets a goal for completing sanitary surveys once every two years. For the 2020-2023 calendar year timeframe, the Illinois DPH has conducted sanitary surveys at approximately 94.67 percent of the NTNCWS and 99.59 percent of the TNCWS under its regulatory authority.

Community Public Water Supply Compliance Assurance Program

To ensure Illinois CWS are in compliance with state and federal statutes and regulations, the Illinois Pollution Control Board (IPCB) adopts identical in substance regulatory provisions from the U.S. EPA, per Section 5/7.2 of the Act. Ensuring that CWS are in compliance with these regulations, which include MCLs in drinking water, is substantially the core mission of the Compliance Assurance Section (CAS).

Additionally, CAS coordinates technical outreach to water systems to assure proactive compliance measures are taken ahead of formal enforcement. The DPWS conducts compliance efforts for CWS from the Central Office in Springfield.

Non-Community Public Water Supply Compliance Assurance Program

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

Community Public Water Supply Operator Certification Program

The Illinois Public Water Supply Operations Act (415 ILCS 45) establishes the statutory basis for the community water supply operator certification program in Illinois. This statute further establishes a reliable mechanism for Illinois EPA communications with CWS, ensuring that Responsible Operators in Charge (ROINC) supervise the portions of the CWS for which they are accountable, and requiring the timely submittal of information that the Illinois EPA relies upon to protect drinking water quality. Finally, this statute provides the basis for the regulatory requirements found in 35 Ill. Adm. Code Part 681. The most recent amendments to this Part became effective in 2017. The 2017 revisions to the regulation focused on further defining the experience requirements to become a licensed water supply operator in Illinois.

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

The Illinois EPA's CWS Operator Certification Program is administered by the CAS of the DPWS, and is comprised of a working supervisor and three full-time staff.

Non-Community Public Water Supply Operator Certification Program

The Illinois DPH NCPWS program administers a program to properly credential NTNC PWS from the Central Office in Springfield. The Illinois DPH uses the services of the Water Quality Association to conduct initial Operator Certification Training and administer, certification examinations. DPH's Operator Certification Program is administered by the Safe Drinking Water Program Manager and one full-time staff.

Community Public Water Supply Capacity Development Program

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

demonstration elements will continue to be integrated into the routine activities of both Agencies in order to ensure continued progress.

It is difficult to estimate the full-time equivalents devoted to this program as it is integrated into all aspects of the drinking water program. The Capacity Development program is now managed by a Capacity Development Coordinator under the DPWS Permits Section.

Non-Community Public Water Supply Capacity Development Program

The Safe Drinking Water Program Manager coordinates Capacity Development Program activities at Illinois DPH. Currently, the Program Manager reviews new NTNC Public Water System Construction Permit Applications and performs capacity reviews on these new systems. When capacity reviews are needed at existing NTNC Public Water Systems, the Program Manager coordinates the reviews with water system personnel and RO/LHD field staff.

Cross-Connection Control Program

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

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

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

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

Groundwater and Source Water Protection Program

The Groundwater and Source Water Protection Program in Illinois is framed by Public Acts 83-1268 and 85-063, and the SDWA Section 1453. These laws amended the Act, created the Illinois Groundwater Protection Act (IGPA) 415 ILCS 55, and led to the development of IPCB regulations for groundwater quality standards and protection requirements. Further, the IGPA requires stakeholder input from the ICCG and Groundwater Advisory Council (GAC) on the development of groundwater protection programs, laws and policies. The Act was amended to require the development and implementation of a "priority" Regional Groundwater Protection Planning Program comprised of local stakeholders. In addition, the IGPA requires the ICCG to undertake a comprehensive evaluation of progress being made under these laws with biennial reporting to the Governor and General Assembly. In August of 2019, Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary

or emergency supply of water to develop source water protection plans that must be approved by the Illinois EPA. The DPWS source water protection initiatives are generally managed from the Central Office in Springfield and the Rockford Office by the GWS of the DPWS. The DPWS source water protection initiatives are generally managed from the Central Office in Springfield and the Rockford Office by the GWS of the DPWS.

Permitting Program

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

The Safe Drinking Water Program Manager conducts all permitting functions for NTNCWS from the Central Office in Springfield.

Public Water Supply Revolving Loan Program

The PWS revolving loan program is administered by the Illinois EPA's BOW-IFAS. IFAS also administers the Water Pollution Control revolving loan program. IFAS manages all aspects of the funding process with input from the DPWS. Detailed program information is available on the Illinois EPA web site at https://www2.illinois.gov/epa/topics/grants-loans/state-revolving-fund/Pages/default.aspx.

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

The Illinois EPA's revolving loan funding process is unlike that of a bank in the respect that the Illinois EPA does not offer the funding agreement until after the recipient has demonstrated a definitive need for the project, obtained Illinois EPA Planning Approval, obtained all necessary permits, demonstrated the means and ability to repay the funding, adopted all necessary ordinances to do so and then gone out to bid on the project. Once a "winning/low" bidder is identified, the Illinois EPA can issue the Loan Agreement followed by the loan applicant entering into the contract for construction of the project. The Illinois EPA can fund the construction costs as well as planning efforts, design engineering and construction engineering/oversight. At the present time, loan applicants are anticipating a "Base" interest rate of approximately 1.4 percent for State Fiscal Year 2021. Interest rates are established each July 1 for the wastewater loan program, and the drinking water loan program, for the following 12-month period

based upon one-half of the previous 12-month mean interest rate of the 20 General Obligation Bond Buyer Index. As of July 1, 2017, loan applicants can qualify for reduced interest rates (Small Community Rate and/or Hardship Rate) based upon their service population, median household income, unemployment rate and population trends. Loan applicants qualifying for the Small Community Rate or Hardship Rate also have the option of extending the term of their loan beyond the traditional 20 years, up to a maximum of 30 years, provided the term of the loan does not exceed the useful life of the funded project. Details on the fixed loan rate of a loan agreement and repayment periods can be found within 35 Ill. Adm. Code Part 662. The BOW estimates that this program currently utilizes 17 full-time staff.

Laboratory Certification

Illinois continues to provide a Laboratory Certification Program for all regulated contaminants, to certify commercial and municipal laboratories within the State. A remote assessment of Illinois EPA's laboratory was conducted on October 26 – November 3, 2021, and an audit report was sent to the State on May 5, 2022. Illinois EPA submitted responses to the report on June 17, 2022. Full Certification was granted on May 11, 2023, after all responses were accepted, which is contingent upon the laboratory's continued demonstration of acceptable performance through the analysis of annual proficiency testing samples.

The DPH's Lab audit visit occurred July 25, 2022, and full certification was granted for microbiological analytes and methods on July 29, 2022. The next audit is scheduled for July, 2024. Illinois continues to meet the elements of its Performance Partnership Agreement (PPA) with U.S. EPA.

- Illinois continues to audit all laboratories that produce results for compliance with SDWA at least once every two years and will meet all regulatory requirements.
- Illinois EPA's Division of Laboratories maintains a certification program and a certified State Lab for inorganic and organic contaminants of concern.
- IDPH maintains a certification program and a certified State Lab for bacteriological contaminants of concern.
- Illinois EPA and DPH submit responses to annual questionnaires to U.S. EPA Region 5.
- U.S. EPA Region 5 tracks State commitments to conduct laboratory certification activities by the IDPH and the Illinois EPA's Division of Laboratories.

Compliance and Enforcement Management

Illinois EPA and IDPH maintain an adequate enforcement and compliance assistance program. Illinois EPA issues Notices of Significant Deficiencies found within thirty days of completion of a sanitary survey, to which a response in the form of a Corrective Action Plan including a compliance schedule is required. When a system fails to meet the compliance deadlines contained in a Corrective Action Plan, Illinois EPA issues a Violation Notice to the system, in accordance with Section 31 of the Illinois Environmental Protection Act, 415 ILCS 5/31 (2022). In addition, Illinois EPA issues Violation Notices upon a system accruing eleven Enforcement Target Tool points, in accordance with USEPA's 2009 Enforcement Response Policy, and when a system incurs MCL exceedance violations, two consecutive monitoring violations, a failure to issue Public Notice, Lead Consumer Notification Form, and Consumer Confidence Reports, among other violations. Once a Violation Notice has been issued, Illinois EPA enters into a Compliance Commitment Agreement that includes a schedule for returning to compliance, or makes a referral to the Office of the Illinois Attorney General for the filing of a civil complaint. Once a civil complaint has been filed, Illinois EPA works with the Attorney General's Office to obtain a Consent Order or Judgment that requires the system to return to compliance in accordance with the required actions and deadlines.

Illinois and U.S. EPA Region 5 continue to implement data exchange to ensure that enforcement resources are targeted at the non-compliant PWS. Current and historical violation data[3] and follow-up enforcement actions can be found at the following web site: http://water.epa.state.il.us/dww/index.jsp.

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

Data management and reporting

Illinois EPA and IDPH maintain adequate data management systems (and updates it for new rules, and new versions of FedRep) that track requirements for all rules, which includes the appropriate combination of hardware, software, and personnel to accurately identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN, and public information requirements. Illinois continues to meet the elements of its PPA with U.S. EPA:

- Illinois EPA and IDPH continue to report to U.S. EPA actions and sample data quarterly and inventory data at least annually, in accordance with 40 CFR 142.15.
- Illinois EPA and IDPH utilizes SDWIS/STATE to manage water system compliance with all regulatory compliance concerns.
- U.S. EPA Region 5 tracks quarterly and annual data reporting requirements.

Operator Certification

Illinois continued to maintain regulations for the operation and maintenance of all public water systems by properly certified individuals. Illinois continues to meet the elements of its PPA with U.S. EPA:

- Illinois continues to report to U.S. EPA the status of the operator certification program on an annual basis.
- U.S. EPA Region 5 tracks completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.

Capacity Development

Illinois has continued to work with existing PWSs and required capacity demonstrations for new PWS to enhance water system technical, managerial, and financial capacity to operate in compliance with federal and State regulations. Illinois EPA and IDPH continue to report to U.S. EPA the status of the Illinois Capacity Development Program on an annual basis. U.S. EPA Region 5 tracks completion of this report to avoid a 20 percent withholding of the Illinois Drinking Water Revolving Loan Fund grant should Illinois fail to meet this commitment.

Source Water Assessments and Protection

Illinois has reported the number of CWSs with a Source Water Assessment Program (SWAP) report and implementation of SWAP measures electronically via SDWIS/STATE at 49.6 percent (871 of 1,757) of CWS. These systems that have SWAP source water protection minimize the risk to public health through source protection. Additionally, 72.6 percent (8,728,659 of 12,027,856) of the Illinois population served by community water systems have source water protection that have been identified in the SWAP program. In August of 2019, Part 604 of the Board regulations was approved that updated the SWAP program by requiring CWSs to prepare a Source Water Protection Plan (SWPP) that must be approved by the Illinois EPA. CWS (23 systems) serving a total population greater than 50,000 submitted their plans in 2022; CWS serving a total population greater than 5,000 (295 systems) are due to be submitted by July 26, 2023; and the remaining CWSs (761 systems) are due to be submitted by July 26, 2024. Illinois EPA anticipates that these efforts will drastically improve the percent of CWSs that have minimized risks to public health through substantial implementation of SWPP plans. Illinois CWS are required to review their SWP plans every five years or when the system makes a change to their water source. The continued updates to SWPP's will substantially protect the source water of all CWS in the State.

Reporting Requirements

Each quarter, the Illinois EPA submits data to the Federal Safe Drinking Water Information System (SDWIS/FED), an automated database maintained by the U.S. EPA. The data submitted by Illinois include,

but are not limited to the following: CWS inventory information; incidences of violations of MCLs, MRDLs, monitoring, and TT violations; information on enforcement activity related to these violations; and source water protection information. The Illinois EPA publishes a report on its website that contains information on permits issued during the previous year. The report includes CWS details regarding the construction and operating permit process, including milestones that measure program efficacy. The ICCG reports biennially to the Governor and the General Assembly on groundwater quality, quantity, and the State's enforcement efforts.

Measures and Indicators

Illinois continues to use quantitative measures developed by U.S. EPA Region 5 to regularly assess program performance. (See Appendix G) These include, but are not limited to the following activities:

- Illinois continues to participate in semi-annual conference calls with U.S. EPA Region 5 to discuss national program measures, Region 5 specific shared goals and special high priority queries.
- Illinois continues to provide information regarding lead action level exceedances upon request from U.S. EPA Region 5.
- U.S. EPA Region 5 continues to track the status of the Illinois Drinking water program with respect to national program measures, Region 5 specific shared goals and special high priority queries.
- Public health concerns related to Lead and Copper Rule (LCR) implementation will remain a high priority area of focus.

Monitoring: What We Test For—and Why

Illinois CWS are tested for different types of contaminants. The number of samples and how often the testing is done depends on the type of contaminant and other factors. The type of contaminant also determines what actions are taken if unacceptable levels are found in the water.

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

ACUTE

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

CHRONIC

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

Public Water Supply Compliance Assurance Program

For calendar year 2022, 99.2 percent of the population served by CWS in Illinois receive drinking water that meets all applicable health-based drinking water standards. Also, for calendar year 2019, 96.8 percent of CWS in Illinois meet all applicable health-based drinking water standards.

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

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

Bacterial Contamination. The coliform test is used as a general indicator of water quality in the system, in terms of potential microbial contamination. If the coliform test is negative, it is an indication that the system is adequately protected against contamination from other types of disease-causing organisms. However, if coliform bacteria are found in the water, it is assumed that the system may be compromised, and steps are taken to protect the people who use the water.

Total coliform bacteria (without the detection of fecal coliform or *E. coli)* are generally not harmful. In these cases, the system will identify the source of the contamination, correct the problem, and thoroughly disinfect its system. The public will also be notified of the situation; however, unless unusual circumstances exist to cause particular concern about the safety of the water, a boil water notice would not be issued as would be if fecal coliform or *E. coli* were found.

Nitrate/Nitrite. Community water supply systems in Illinois are tested once a year for nitrate, a chemical that may occur naturally in the environment but that can also enter the water from sources like fertilizer run-off, decaying plant and animal wastes, and sewage. Nitrate is a health concern primarily for infants under the age of six months. The infant's digestive system can convert the nitrate to nitrite, which can interfere with the ability of the infant's blood to carry oxygen. The result is a serious illness known as methemoglobinemia, or"blue baby syndrome." Methemoglobinemia can be fatal if nitrate levels in the water are high enough and the illness is not treated properly.

The MCL for nitrate in drinking water is 10 parts per million (ppm). If a water supply system exceeds the standard, the people who use the water are notified and advised not to use the water for mixing infant formula or other uses that might result in consumption of the water by infants under six months of age. The advisory is kept in place until steps can be taken to reduce nitrate levels in the water. Possible remedial measures include treating the water to remove the nitrate or drilling a new water well.

Older children and adults are generally not at risk from drinking nitrate-contaminated water. In fact, the average adult consumes about 20-25 milligrams of nitrate per day in food, primarily from vegetables. Because of changes that occur after six months of age, the digestive tract no longer converts nitrate into nitrite. However, some adults—including people with low stomach acidity and people with certain blood disorders—may still be at risk for nitrate-induced methemoglobinemia.

Inorganic Chemicals. Community water systems in Illinois are tested for 13 other inorganic chemicals in addition to nitrate. If past results don't indicate the presence of inorganic chemicals, testing is usually done once every three years, otherwise, it may be done as often as once a year. The list includes

antimony, arsenic, barium, beryllium, cadmium, chromium, cyanide, fluoride, mercury, nickel, selenium, sulfate, and thallium. In some cases, these chemicals may be naturally present in the groundwater. If a water supply system were to exceed the MCL for one of these 18
chemicals, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and appropriate steps would be taken to reduce levels of these chemicals in the water.

Radioactive Elements. Community water systems in Illinois are also usually tested once every three years, or as often as once a year, in some cases, for a list of radioactive elements. If past results don't indicate the presence of radioactive elements, testing is usually done once every nine years. If a system were to exceed the federal MCL for one of these radioactive elements, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and steps would be taken to reduce the levels of these elements in the water.

Disinfection By-Products. Disinfection rids drinking water of microbiological organisms, such as bacteria, viruses, and protozoa, that can cause and spread diseases. The most common method of disinfection is the addition of chlorine to drinking water supplies. Not only is chlorine effective against waterborne bacteria and viruses in the source water, it also provides residual protection to inhibit microbial growth after the treated water enters the distribution system. This means the disinfectant continues working to keep the water safe as it travels from the treatment plant to the consumer's tap. However, even though chlorine has been a literal lifesaver with regard to drinking water, it also has the potential to form by-products that are known to produce harmful health effects. Chlorine can combine with organic materials in the raw water to create contaminants called trihalomethanes (THMs) and haloacetic acids (HAAs). Repeated exposure to elevated levels of THMs over a long period of time could increase a person's risk of cancer. The formation of disinfection by-products is a greater concern for water systems that contain organics or use surface water, such as rivers, lakes, and streams, as their source. Surface water sources are more likely to contain the organic materials that combine with chlorine to form THMs and HAAs.
All community water systems that add a disinfectant to the water must regularly test their treated water to determine if THMs and HAAs are present. If a water supply system were to exceed the MCL for THMs or HAAs, the people who use the water would be notified, the monitoring schedule would be increased to quarterly, and appropriate steps would be taken to reduce levels of these chemicals in the water.

Lead and Copper. All community and non-transient public water systems have been tested for lead and copper. In community water systems, the water is tested in a specific number of homes within each system to determine if the water exceeds the federal "action level" of 15 parts per billion (ppb) for lead or 1,300 ppb for copper. If a system exceeds the action level for lead or copper in more than 10 percent of the locations tested, it is required to take corrective action and do further testing. Current testing frequencies are based partly on the results of that initial round of testing and of the success of subsequent efforts to reduce risk of lead contamination in systems that have previously exceeded the action level.19

<u>Monitoring Violations for Calendar Year 2022:</u>
The following table summarizes the number of CWS in violation with aspects of the drinking water compliance program during 2022. In the cases of a violation, a water system is required to take corrective actions. These actions include public notification to inform affected residents of the situation and if there are any special precautions they should take. In all cases noted here, residents were advised directly by the water system at the time the violation occurred. All community water systems have also noted any violations in the annual water quality reports (also called Consumer Confidence Reports) they distribute to their residents.

Information on all violations for CWSs in 2022 is in Appendices A and B, Appendices C and D for TNCWS and Appendix E and F for NTNCWS. Illinois EPA & IDPH) continue to address all systems not in compliance with state rules and regulations. Specifically, Illinois will address non-compliant PWSs that have a score of 11 or higher on the U.S. EPA's Enforcement Targeting Tool report, in accordance with the OECA Enforcement Response Policy.

- As an enforcement option, Illinois may refer noncompliant PWSs to the U.S. EPA Region 5 for follow-up action or the Illinois Attorney General's Office
- Illinois EPA and IDPH continue to keep records relating to enforcement decisions.
- Illinois EPA and IDPH continue to produce an annual compliance report by July 1 as part of a consolidated report program efficacy.
- U.S. EPA Region 5 track state commitments under measure SDWA02 (involving addressing with a formal enforcement action or return to compliance), the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July Enforcement Targeting Tool report, and update Illinois quarterly.
- Illinois EPA and IDPH worked with U.S. EPA on the National Compliance Initiative (NCI).

Violations during Calendar Year 2022 Community Water Systems						
Total Number of Regulated Systems					**1753**	
Total Number of Systems in Violation*					**385**	
Total Number of Violations					**1160**	
Rule Subtotal by Violation Type						
Rule Category	**MCLs**		**Treatment Techniques**		**Significant Monitoring Reporting**	
	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*	Number of Violations	Number of Systems*
Arsenic	2	2	0	0	2	2
Radiological	7	4	NA	NA	29	21
Nitrates	0	0	NA	NA	1	1
IOCs	0	0	NA	NA	0	0
SOCs	0	0	NA	NA	127	4
VOCs	0	0	NA	NA	107	6
Coliform	0	0	1	1	61	39
Ground Water Rule	NA	NA	0	0	0	0
All SWTR	NA	NA	0	0	0	0
DBPR (Stage 1) (chlorine chloramines)	NA	NA	0	0	51	44
DBPR (Stage 2)	28	14	0	0	50	25
Lead & Copper	NA	NA	28	22	122	105
Public Notice	NA	NA	NA	NA	115	63
Consumer Confidence Rule	NA	NA	NA	NA	54	52
TOTALS	**37**	**20**	**29**	**23**	**550**	**247**

	*Percentage of Systems In Compliance = 98.8**%**	*Percentage of Systems In Compliance = 98.6**%**	*Percentage of Systems In Compliance = 85.9**%**

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

Violations during Calendar Year 2022 Non-Transient Non-Community Water Systems						
Total Number of Regulated Systems					**423**	
Total Number of Systems in Violation*					**248**	
Total Number of Violations					**1728**	
Rule Subtotal by Violation Type						
Rule Category	**MCLs**		**Treatment Techniques**		**Significant Monitoring Reporting**	
	Number of Violations	Number of Systems	Number of Violations	Number of Systems	Number of Violations	Number of Systems
Radiological	NA	NA	NA	NA	NA	NA
Arsenic	3	1	NA	NA	10	6
IOCs	0	0	NA	NA	20	3
Nitrates	1	1	NA	NA	1	1
SOCs	0	0	NA	NA	666	20
VOCs	0	0	NA	NA	777	22
Revised Total Coliform Rule	1	1	0	0	35	31
Ground Water Rule	0	0	0	0	1	1
SWTRs	0	0	0	0	0	0
DBPR (Stage 1) (chlorine chloramines)	NA	NA	9	9	8	7
DBPR (Stage 2)	0	0	0	0	0	7
Lead & Copper	NA	NA	1	1	171	137
Public Notice	NA	NA	NA	NA	73	47
Consumer Awareness	NA	NA	NA	NA	0	0
TOTALS	**5**	**3**	**10**	**10**	**1713**	**235**
	*Percentage of Systems In Compliance = 99.2%		*Percentage of Systems In Compliance = 97.6%		*Percentage of Systems In Compliance = 44.4%	

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

Violations during Calendar Year 2022 Transient Non-Community Water Systems						
Total Number of Regulated Systems				**3084**		
Total Number of Systems in Violation*				**521**		
Total Number of Violations				**653**		
Rule Subtotal by Violation Type						
Rule Category	**MCLs**		**Treatment Techniques**		**Significant Monitoring Reporting**	
	Number of Violations	Number of Systems	Number of Violations	Number of Systems	Number of Violations	Number of Systems
Nitrates	1	1	NA	NA	12	12
Revised Total Coliform Rule	7	7	321	224	121	110
Ground Water Rule	0	0	0	0	6	6
Lead & Copper	NA	NA	0	0	3	2
Public Notice	NA	NA	NA	NA	182	159
TOTALS	**8**	**8**	**321**	**224**	**324**	**289**
	*Percentage of Systems In Compliance = 99.0%		*Percentage of Systems In Compliance = 92.7%		*Percentage of Systems In Compliance =90.6%	

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

Three-Year Summary of the Public Water Supply Loan Program (PWSLP)

The Public Water Supply Loan Program (PWSLP) is administered by the Illinois EPA's BOW-Infrastructure and Financial Assistance Section. IFAS also administers the Water Pollution Control Loan Program (WPCLP). IFAS manages all aspects of the funding process with inputs from various stakeholders (internal and external). Both loan programs provide low-interest loans through the Water Revolving Fund (WRF). These programs are annual recipients of federal capitalization funding combined with state matching funds, interest earnings, repayment money, and the sale of bonds to form a source of financing for infrastructure projects. The term "Revolving Fund" means that any interest earned, and money repaid, is put back into the program to fund additional projects and increase program outreach.

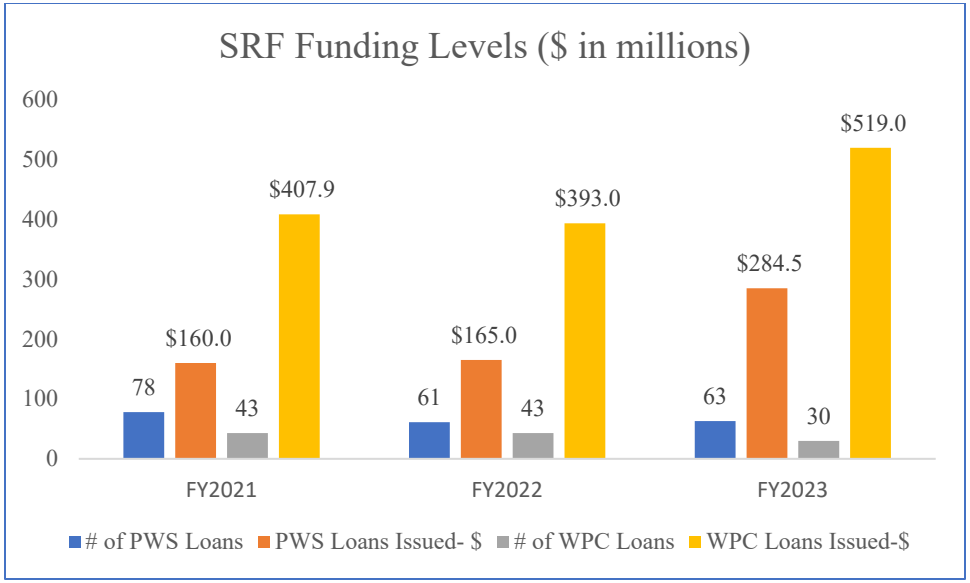
Our programs provide financial assistance to eligible public or private applicants for the design and construction of a wide variety of projects that protect or improve the quality of Illinois' water resources. The loan programs assist applicants with projects that address human health and failing water infrastructure. Eligible projects include new drinking water or wastewater infrastructure construction; upgrading or rehabilitating existing infrastructure stormwater related projects that benefit water quality; and a variety of other projects that protect or improve the quality of Illinois rivers, streams, and lakes. Our historical list of borrowers includes the state's largest city, as well as many small communities and water districts with populations less than 1,000 people.

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

The Illinois EPA's revolving loan funding process is unlike that of a bank in the respect that the Illinois EPA does not offer the funding agreement until after the recipient has demonstrated a definitive need for the project, obtained Illinois EPA Planning Approval, obtained all necessary permits, demonstrated the means and ability to repay the funding, adopted all necessary ordinances to do so and then gone out to bid on the project. Once a "winning/low" bidder is identified, the Illinois EPA can issue the Loan Agreement followed by the loan applicant executing the contract for construction of the project. The Illinois EPA can fund the construction costs as well as planning efforts, design engineering and construction engineering/oversight. At the present time, loan applicants are anticipating a "Base" interest rate of approximately 1.81 percent for State Fiscal Year 2024. Interest rates are established each July 1 for the wastewater loan program, and the drinking water loan program, for the following 12-month period based upon one-half of the previous 12-month mean interest rate of the 20 General Obligation Bond Buyer Index. As of July 1, 2017, loan applicants can qualify for reduced interest rates (Small Community Rate and/or Hardship Rate) based upon their service population, median household income, unemployment rate and population trends.

Below are the PWSLP funding levels from FY21-23:

	FY2021	**FY2022**	**FY2023**
# of PWS Loans Issued	78	61	63
PWS Loans Issued-$	$160.0M	$165.0M	$284.5M
# of WPC Loans Issued	43	43	30
WPC Loans Issued-$	$407.9M	$393.0M	$519.0M



The PWSLP program (along with the WPCLP) has been supplemented with the Bipartisan Infrastructure Law (BIL)/Infrastructure Investment and Jobs Act Funds (IIJA) funding in addition to the annual federal capitalization grants, received from the USEPA.

Illinois share of Infrastructure Investment and Jobs Act Funds

Year	Clean Water SRF Illinois 4.43%	Drinking Water SRF Illinois 3.69%	Total	Match	Additional Subsidy
2022	80,494,000	67,885,000	148,379,000	$ 14,837,900	$ 72,705,710
2023	94,270,000	63,895,000	158,165,000	$ 15,816,500	$ 77,500,850
2024	101,696,678	85,766,380	187,463,058	$ 37,492,612	$ 91,856,899
2025	110,160,821	92,904,656	203,065,477	$ 40,613,095	$ 99,502,084
2026	110,160,821	92,904,656	203,065,477	$ 40,613,095	$ 99,502,084
Total	**$496,782,321**	**$403,355,691**	**$900,138,012**	**$149,373,202**	**$441,067,626**

Year	Clean Water Emerging Contaminants Illinois 4.43%	Drinking Water Emerging Contaminants Illinois 3.69%	Total	Match	Additional Subsidy
2022	4,229,000	28,505,000	32,734,000	$ -	$ 32,734,000
2023	9,617,000	23,186,000	32,803,000	$ -	$ 32,803,000
2024	9,515,250	28,505,000	38,020,250	$ -	$ 38,020,250
2025	9,515,250	28,505,000	38,020,250	$ -	$ 38,020,250
2026	9,515,250	28,505,000	38,020,250	$ -	$ 38,020,250
Total	**$42,391,750**	**$137,206,000**	**$179,597,750**		**$179,597,750**

Year		Drinking Water Lead Illinois 3.69%		Match	Additional Subsidy
2022		106,964,000		$ -	$ 52,412,360
2023		230,177,000		$ -	$ 112,786,730
Total		**$337,141,000**			**$165,199,090**

Based on the data above, it is expected that Illinois will provide $149,373,202 in state match funding for the next 5 years as a requirement of receiving the federal capitalization grants from USEPA. This state match is an addition to the state match required for annual base federal capitalization grants the program receives from USEPA.

Lead Service Line Funding

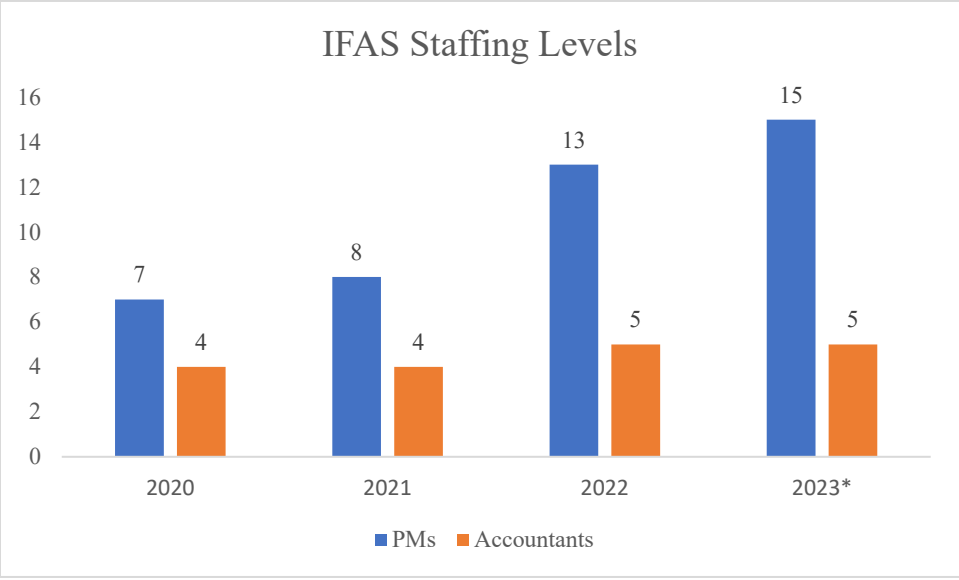
The PWSLP has been funding lead service line projects since 2017. Each year, the program has seen an increase in the number of projects requesting funding. The PWS program expects to receive $106,964,000 in year 1 of the IIJA Lead funding and $230,177,000 in year 2. The funding amounts for Year 3-5 are to be determined as of now. 49% of this funding must be provided as principal forgiveness, meaning a portion of the loan does not have to be paid back and 51% of the funding will be issued as a loan that must be repaid back to the agency. Recently, the agency took part in developing new Administrative Rules for the Public Water Supply Loan

Program to provide funding for Lead Service Line Replacement (35 ILL. Adm. Code 663). The new rule update allows for scoring of a project based on the information from the most recent American Community Survey 5-year estimate from the US Department of Commerce, Bureau of the Census. The applicant will identify the census tract(s) of the project area from the U.S. Department of Commerce, Bureau of Census.

In 2019, Illinois EPA took advantage of the Water Infrastructure Fund Transfer Act (WIFTA), which temporarily expanded the Clean Water to Drinking SRF transfer authority specifically to address lead-related threats to public health. A total of $107,892,848 was transferred to the PWSLP that must be provided as loans with 100% principal forgiveness for complete lead service line replacement activity. Illinois EPA has $3,748,337 left in unspent WIFTA funds and, therefore, will add this amount to the BIL-Lead disadvantaged community principal forgiveness for FY2024.

Staffing

The IFAS unit has grown significantly in the last 4 years in terms of FTEs. As shown in the chart below, in 2020, the unit was staffed with only 11 (7-Project Managers, 4- Accountants) but in 2023 the unit is staffed with a total of 20 FTEs. The IFAS unit is well-positioned not only in its ability to process loans but also for the grant programs as well. It is a good practice to continue to assess the staffing needs of the SRF program and IFAS will continue to partake in such conversations so that the mission and the goals of the SRF program continue to be met.



The following pictures are from projects that were funded by the Water Revolving Fund:

St. Charles Red Gate Road Elevated Water Storage Tank

Water Plant Springfield, Illinois

Green Infrastructure Project, Champaign, Illinois

Water Plant Springfield, Illinois

STATE CAPACITY DEVELOPMENT STRATEGY EFFICACY AND PROGRESS

CWS

The Illinois EPA uses a combination of tools to assist existing CWS systems in acquiring and maintaining TMF capacity. These tools include engineering evaluations, enforcement actions, permit requirements for construction and operation, the Drinking Water State Revolving Fund (DWSRF), Source Water Protection Program, monitoring requirements, Operator Certification Program, cross-connection control, and technical assistance partnerships.

Technical Assistance

The Illinois EPA provides technical assistance to small and disadvantaged CWS via its field office staff and technical assistance partners such as Illinois Rural Water Association (IRWA). Illinois EPA entered into a $250,000 contract for an initial two-year term (FY2019 and FY2020) with the Illinois Rural Water Association to assist public drinking water systems in Illinois with activities and issues including, but not limited to, technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development issues. The contract was renewed in FY2023 for five years running from July 1, 2023, through June 30, 2028, and will now be funded using the Local Assistance & Other Set Aside ($200,000 each year). IRWA provides the Illinois EPA with statewide small systems technical assistance set-aside quarterly reports. The reports include the detailed technical, managerial, and financial capacity work completed. The contractor meets with Illinois EPA staff to determine potential public water supply systems in need of assistance. The contractor assists the small systems' staff, owners, operators, clerks, boards and council members with system improvements, loans and grant applications, rate setting, and technical, managerial, and financial matters.

Illinois EPA Field Operations Section field staff conduct periodic inspections of all CWS systems to determine if their ongoing programs for monitoring, maintaining the water supply, and providing appropriate information to the water users meets the requirements of the Illinois Pollution Control Board's (Board) public water supply regulations and related standards. Inspections are conducted for each CWS system approximately every three years with priority given to systems with a population greater than 10,000 and surface water supplies. Inspections may also be conducted to follow-up on significant deficiencies noted in the previous inspections as well as emergency situations. Across all regions of Illinois, 491 inspections were conducted in the 2023 State FY. Recently Illinois EPA field staff provided technical assistance to a CWS system that received a violation for failure to submit monthly operating reports. The system is now submitting complete reports to the Illinois EPA on time. Another example of technical assistance provided by field staff was for a CWS system struggling to obtain a certified operator. Field staff worked with the system to get an approved contract for a certified operator and worked with the new operator to develop an approvable nitrification action plan. The Illinois EPA has taken steps to have field operations staff clearly document the type of technical assistance provided during

inspections. Illinois EPA field staff routinely advise CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with.

Field staff visually observe the facility and review on-site documents to evaluate the TMF capacity of existing systems. Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each public water supply. The TMF pre-screening survey assists systems in acquiring and maintaining TMF capacity because it allows the system and inspectors to identify areas of capacity that could be improved upon. For example, in October 2022, an inspection was conducted for a small community water supply. The TMF survey indicated that the system did not have an up-to-date Cross Connection Control Survey or Emergency Operations Plan. Illinois EPA field staff discussed 35 Ill. Adm. Code Subtitle F requirements and referred the system to the IRWA website for further information. The system has since responded that the Emergency Operations Plan is in the process of being updated and the cross-connection survey was sent out February 2023. This example illustrates the success and progress Illinois EPA has had with building TMF capacity through the use of sanitary surveys, and technical assistance provided by field staff and technical assistance partners. In the past year, the Illinois EPA updated the TMF pre-screening survey to include a section on asset management and updated existing sections to include climate resiliency measures, cybersecurity measures and more. Through its contract with IRWA, Illinois EPA is providing technical assistance to small systems for the development of asset management plans. Again, this partnership with a technical assistance provider is bolstering Illinois EPA's capacity development program and efforts to build TMF capacity for the CWS who need the most assistance.

Once the engineering evaluation is complete, field staff send a non-compliance advisory letter to the CWS system notifying them that the inspection was completed and any regulatory deficiencies and/or recommendations are provided as attachments. The Illinois EPA added language to these letters recommending that systems without an asset management plan or without a plan that meets the five-core question framework begin to develop an asset management plan. The recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. CWS systems are then required to respond to deficiencies noted within 30 days. The response must detail the steps that have been or will be taken to correct these deficiencies.

If an adequate response is not received within 30 days from the date of an inspection letter, the public water supply may be added to the Restricted List for any significant deficiencies that fall under one of the following categories: maximum contaminant level violations, treatment technique violations, source water quantity requirements, treatment unit loading rates, storage volume requirements, and distribution minimum pressure requirements. If the inspection finds that the CWS system exceeds 80 percent of the rate of any of the Board or Agency's, the system will be added to the Critical Review List.

The Illinois EPA has taken steps towards utilizing the Safe Drinking Water Information System (SDWIS) to track inspection deficiencies. The Agency has trained field engineers to enter deficiencies found during site inspections into SDIWS. The Field

Operations Section enters this data into SDWIS. The Illinois EPA will use this data in the future to track the number and type of deficiencies found during engineering evaluations. The number and type of deficiencies found each year will be compared to baseline data to determine capacity trends.

Enforcement Actions

In Illinois, violations of the SDWA result in the system entering the enforcement process. The enforcement process allows the Illinois EPA to identify and address violations that are a direct result of inadequate TMF capacity. By requiring systems to address the violations, the TMF capacity of existing systems are improved. The Illinois EPA internal enforcement process escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time results in formal enforcement action. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) requires that CWS systems receive notification of any violations observed by representatives of the Illinois EPA within 180 days of discovery of the violation.

Actions or deficiencies that may result in enforcement actions include, but are not limited to, the following: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, permit violations, any operational issues that lead to immediate short-term health threats, and lack of a certified operator. Other deficiencies found during site-inspections or permit section investigations may also result in the enforcement process if not corrected. All enforcement actions are tracked using the State's Master Notice of Violation (NOV) Database. A list of violation notices and descriptions of the violations issued in State FY 2023 are shown in Table B of this report.

DWSRF

Illinois continues to work to capitalize the DWSRF for communities in need of financial capacity assistance. Providing low-interest loans to public water systems allows them to have the financial capacity to make necessary improvements to infrastructure and ensure compliance with drinking water regulations. For State FY 2023 the Illinois EPA issued approximately $338,426,372 in loans from the Public Water Supply Loan Program (PWSLP) of which approximately $53,965,289 went to loan applicants, in the form of principal forgiveness, who qualified for lead service line replacement funding, and $339,433 went to loan applicants who qualified for the "small system compliance assistance principal forgiveness". The small system compliance assistance principal forgiveness was made available to CWS systems with a health-based maximum contaminant level violation. Eligible projects must result in the system with a history of health-based violations returning to compliance and must meet the following requirements: have an enforcement action initiated by the Illinois EPA; a population with a median household income below the State average median household income; and must serve fewer than 1,500 customers.

Pursuant to 35 Ill. Adm. Code 662.130, public water supplies are ineligible for financial assistance under the PWSLP if they lack the technical, financial, and managerial capability to ensure compliance with the requirements of SDWA, unless the assistance will ensure compliance. The DWSRF program is an essential tool for systems to have the financial means to achieve adequate technical capacity. Pursuant to 35 Ill. Adm. Code 662.345, loan projects can be given additional priority points if the project includes the consolidation of two systems, removes applicants from the Restricted Status/Critical Review List, remedies health violations, or replaces lead service lines. Priority points are also given to applicants who are developing or implementing a source water protection plan or asset management plan.

The PWSLP also can offer a reduction to the amount of principal that an applicant would otherwise need to repay for its project. This reduction is called "principal forgiveness" per federal statue. Principal forgiveness functions much like a grant where the eligible capital costs of the project are reduced by the principal forgiveness amount, thereby eliminating a portion of the principal (and interest) that the borrower must repay. For State FY 2023 the Illinois EPA offered four types of principal forgiveness: Lead Service Line Replacement, Disadvantaged Community Principal Forgiveness, Small System Compliance Assistance Principal Forgiveness, and One Well Critical Review Principal Forgiveness. The DWSRF program and principle forgiveness are an integral tool in building capacity development and making progress with TMF capacity for Illinois' CWS.

Permit Requirements for Construction and Operation

Illinois has had a water supply permit program for many years, even prior to the creation of the Illinois EPA in 1970, under the Board of Health. Currently, the Illinois EPA issues construction and operating permits for CWS systems. Pursuant to 35 Ill. Adm. Code 602.200(a), a person must not cause or allow the construction of any new CWS installation, or cause or allow the change of or addition to any existing CWS, without a construction permit issued by the Illinois EPA. 35 Ill. Adm. Code 602.200(b) specifies changes that require a permit, which include any alternations that may affect the sanitary quality, mineral quality or adequacy of CWS systems, adding new chemicals or points of application to the treatment process, and rehabilitating a water main using a liner.

The permit program allows Illinois EPA to ensure that adequate technical and managerial capacity is provided for new and improved community water systems. Existing systems must show that proposed improvements meet the requirements of 35 Ill. Adm. Code Part 604. This documentation includes confirmation of back-up power, adequate capacity to meet maximum daily demand, that finished water meets the requirements of 35 Ill. Adm. Code Part 611, and more. All new public water supplies must demonstrate technical, financial and managerial capacity to ensure compliance with drinking water standards pursuant to 35 Ill. Adm. Code 652.300. The documents in the capacity demonstration included, but are not limited to, personnel organizational charts, an operation management plan, and emergency management plan.

Source Water Protection Program

The Illinois EPA has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Illinois SWAP activities are divided into the following areas: community surface water supplies, non-community surface water supplies, community groundwater supplies, Lake Michigan supplies, non-community groundwater supplies, and mixed ground and surface water community water supplies. Assessments have been conducted for all public water supplies in Illinois, including approximately 1,800 community water supplies. In addition, more than 4,100 non-community water supplies have been assessed.

SWAPs will help communities make important decisions about how to protect their drinking water by working to ensure safe drinking water supplies, the health and economy of the community, as well as the preservation of natural resources. In addition, investments in drinking water treatment will be sustained for a longer period of time. In 2019, 35 Ill. Adm. Code Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary or emergency supply of water to develop source water protection plans (SWPP) that must be approved by the Illinois EPA.

Last year, 27 SWPPs for large CWS systems (with populations >50,000) were submitted to the Illinois EPA. The due date for submitting plans for medium CWS systems (with populations between 3,000 and 50,000) was July 25, 2023. The Illinois EPA has received 208 plans from medium systems. SWPP submittals for small systems are due July 25, 2024. The SWPPs will be reviewed to ensure the system has conducted an internal evaluation of their water source(s) and measures are in place to protect each system's water resources.

Monitoring Requirements

By requiring CWS systems to have a monitoring schedule the Illinois EPA can evaluate whether or not CWS systems are collecting samples at the locations and frequencies required by 35 Ill. Adm. Code Part 611. If systems receive monitoring violations this is an indicator that the system may not have adequate managerial, financial or technical capacity to comply with 35 Ill. Adm. Code Part 611. In Illinois, CWS systems are notified of their sampling requirements through sample demand letters. Sample demand letters are sent prior to the start of a monitoring period.

If a new monitoring schedule or a change to a current monitoring schedule is made, the CWS is sent a letter from the compliance officer notifying them of the changes. Monitoring schedules are available to operators through drinking water watch (DWW). Operators are aware that they can view their monitoring schedules in DWW. DWW reflects the most recent monitoring requirements and should be used to confirm monitoring is completed during the correct period.

For lead and copper monitoring changes, the Illinois EPA has a site plan change request form available on our website. CWS systems can request to add, permanently remove, activate, inactivate, and change site information for any of their sites using this form. The owner or operator of each CWS system must develop a material inventory and submit annually by April 15th each year to the Illinois EPA. Responsible Operators in Charge are reminded each year by email notifying them of the upcoming due date to submit their inventory. Illinois EPA is providing technical and compliance assistance for monitoring requirements to CWS via the field offices and the contract with IRWA, who has been providing assistance on monitoring schedules and site plans, and lead service line inventory. Through outreach, IRWA has successfully assisted the Illinois EPA with obtaining service line material inventories from small and disadvantaged CWS.

Operator Certification Program

The Illinois EPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems in order to assure that the water is safe for ordinary domestic consumption and that existing CWS systems are maintaining adequate technical and managerial capacity. The operators must also maintain proper operation of drinking water treatment systems. In State FY 2023, Illinois had 2452 fully certified CWS operators, not including operators that expired in 2022. There were 100 new operators certified in State FY 2023. An operator certified as competent by the Illinois EPA must be able to perform duties without endangering public health.

In order to determine competency, the Illinois EPA must evaluate whether applicants for operator certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification.

To help ensure that certified drinking water operators' knowledge stays current, certified operators are also required to meet continuing education requirements to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third may be comprised of technical or non-technical/professional courses such as safety or management. In 2020, an increase in virtual and correspondence-type operator training courses became available due to the in-ability to meet in-person. The Illinois EPA reviews and approves operator renewal training credit for virtual courses that meet the requirements in 35 Ill. Adm. Code 681.820. These training/continuing education requirements have greatly aided Illinois EPA in helping to build the technical capacity of Illinois' water operators, allowing for continued progress in building capacity development for CWS.

Cross-Connection Control

Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. Industries or facilities installing or possessing backflow prevention devices must have those devices inspected and tested at the time of installation and at least annually thereafter to ensure continued proper operation.

Verification of inspection must be submitted to public water supply officials, who must ensure that appropriate inspection and maintenance of all cross-connection control devices has been performed. If a CWS system does not have a cross-connection control program or does not provide verification of device inspections as required by 35 Ill. Adm. Code Part 604, these significant deficiencies are included in Notice of Significant Deficiencies letters and must be addressed. If the CWS system does not address these items, then enforcement will occur. Field staff review requirements with operators during inspections and inform systems of what would bring them into compliance.

The cross-connection control device inspector approval program is coordinated by the field operation staff as a basic element of the water supply program. In addition, the TMF pre-screening survey also verifies whether systems are currently implementing a cross-connection control program. Registration and instruction are primarily conducted by the Environmental Resources Training Center, Edwardsville (ERTC), who is serving as an important partner in capacity development as ERTC staff help to further develop the skills needed for progress with technical capacity in for Illinois' CWS.

Asset Management

Illinois encourages the development of asset management plans through a multiple path approach that involves the Drinking Water State Revolving Fund (DWSRF) program, operator training and the sanitary survey process. Illinois encourages public water systems to develop asset management plans by assigning priority points to drinking water state revolving fund loan applicants that are either developing or currently implementing an asset management plan pursuant to 35 Ill. Adm. Code 662.345(g).

In addition to its work with IRWA, Illinois EPA and IDPH are working with Great Lakes Rural Community Assistance Program (RCAP) by utilizing USEPA grant money to provide asset management training and technical assistance to systems interested in developing asset management plans. RCAP is currently working with 5 systems (3 CWS and 2 NCWS systems) to write asset management plans.

An asset management section was added to the recently updated TMF pre-screening survey that is currently implemented in Illinois EPA's engineering evaluations as discussed above. Illinois EPA drinking water FOS staff received training via the USEPA's TMF and asset management training modules. The Illinois EPA added language to field office non-compliance advisory letters

recommending that systems without an asset management develop one. Systems with asset management plans that do not meet all elements of the five-core question framework will receive a recommendation to update their plan. The recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. The webpage explains the basics of asset management and allows users to click on links to further asset management guidance documents created by USEPA and the Environmental Finance Center. In the future, the Illinois EPA plans to explore the possibility of requiring asset management plans for DWSRF loan applicants as well as for systems applying for a construction permit to increase capacity by greater than 20%. Illinois EPA views the development of asset management plans as integral to building TMF capacity for Illinois' CWS.

Climate Change Adaptation

The Illinois EPA understands the importance of ensuring CWS systems implement climate change adaptation measures to prepare and adjust to both the current and projected impacts of climate change. The DWSRF program, pursuant to 35 Ill. Adm. Code 662.345, awards loan projects additional priority points if the project contains conservation and green infrastructure measures, specifically: projects that are based upon completion of a system-wide audit; projects with utility rates that promote water conservation; projects that utilize improved technologies and practices to reduce energy consumption or use energy in a more efficient way; projects that utilize renewable energy or that produce renewable energy; projects that contain resiliency components; and projects that implement green infrastructure.

The Illinois Administrative Code requires CWS systems to be constructed and have emergency operation plans to ensure climate change resiliency. Pursuant to 35 Ill. Adm. Code 604.135, CWS systems must develop an emergency operations plan. The emergency operation plan must include a review of the methods and means by which alternative supplies of drinking water could be provided in the event of destruction, impairment or contamination of the CWS system. The CWS system must review its emergency operations plan at least every three years and revise as necessary. Pursuant to 35 Ill. Adm. Code 604.110(b), all CWS facilities must be located outside the flood plain or must be at least two feet above the 100-year flood elevation or maximum flood of record. In addition to these requirements, electrical controls must not be subject to flooding and CWS systems must provide on-site, dedicated standby power capable of maintaining continued operation of its water system during power outages pursuant to 35 Ill. Adm. Code 604.155.

NCWS

The IDPH uses a combination of tools to assist existing NCWS systems in acquiring and maintaining TMF capacity. These tools include sanitary surveys, enforcement actions, permit requirements for construction, Source Water Protection Program, monitoring requirements, Operator Certification Program, and technical assistance.

This program is unique because these systems are not in the business of producing water for resale; therefore, the treatment and monitoring of the water system has not traditionally been a routine function of management. The water supply at these facilities is used for drinking, sanitation and, in some cases, manufacturing processes. Demonstrating capacity for these types of NCWS is, for the most part, a small part of the overall management, budget, and operating plan for these facilities.

Since 2020, IDPH has dramatically increased pre-enforcement, formal enforcement, and cross program initiatives to achieve compliance at NCWS. These activities are resulting in many inquiries from NCWS owners and managers. IDPH is then able to help educate these managers on the importance of safe drinking water as a critical component of their operations.

IDPH uses existing field survey and visit information in addition to enforcement data to identify NCWS who need or may benefit from capacity development assistance. Central Office staff coordinates the dissemination of information and education of NCWS personnel for all new or amended regulations and requirements. When on-site capacity assistance is required, Central Office staff coordinate with Regional Office or Local Health Department staff to provide training or technical assistance.

Sanitary Surveys

Sanitary surveys are performed every 2 years at all active, non-licensed NCWS systems and on an annual basis at all active, licensed systems (i.e. campgrounds, youth camps, bathing beaches, swimming pools, migrant labor camps). The sanitary survey includes a review of the eight elements of a sanitary survey: water source, pumps, distribution, storage, treatment, monitoring and reporting of analytical results/ data verification, management and operation, and operator compliance (non-transient systems). IDPH Regional Offices and Local Health Departments working for IDPH completed 1540 sanitary surveys in the 2023 State FY.

The results of the sanitary survey are documented on a sanitary survey/site inspection form. This form is used during the sanitary survey to provide the central office with a “hard” or “electronic” copy documenting that the survey has covered all the eight elements required under the federal regulations. An evaluation summary for each of the eight elements is indicated for all sanitary surveys. The evaluation summary indicates the element was evaluated and if significant deficiencies were noted under that element. This information is reported in SDWIS/State. Significant deficiencies are also listed in detailed description with required corrective action and a due date for completion. In addition, the sanitary survey/site inspection form indicates any changes that occurred since the last survey and provides a summary of coliform and nitrate samples since the last survey.

An inspection letter must be sent to the owner after the sanitary survey has been completed if significant deficiencies are noted. All significant deficiencies are cited with a time for correction. Any recommendations are also listed.

IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This procedure has taken some time to develop and should be completed by early Fall 2023. The new Sanitary Survey Procedure may also prove useful in providing data trends to track capacity concerns.

During the sanitary survey an update of inventory information is provided if this information has not been updated in SDWIS/State. This would include any new facility information (source, storage, treatment, etc.) as well as updates to administrative contacts and certified operator information.

Enforcement Actions

The IDPH internal enforcement process escalates to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. IDPH developed a new enforcement Standard Operating Procedure (SOP) with implementation beginning in State FY 2023. This SOP sets up specific levels of enforcement based on violation type, number of violations and/or time in non-compliance status.

Actions or deficiencies that constitute violations subject to enforcement include, but are not limited to the following: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, construction violations and lack of a certified operator. Reportable violations are tracked using a combination of SDWIS/State and an access database. When formal enforcement is triggered, it begins with a Notice of Violation (NOV) being sent to the water supplier. NOVs are tracked in the NCWS Program NOV Database. A list of NOVs and descriptions of the violations issued in State FY 2023 are shown in Table G of this report.

Permit Requirements for Construction

A permit to construct a new non-community public water system must be obtained from the IDPH prior to construction. In addition, a permit for any major alteration of, or extension to, a non-community public water system must be obtained from IDPH prior to construction. Major alterations include changes to source, treatment, storage, distribution, or system capacity. Upon completion of any construction for which a permit has been issued, the owner is required to notify IDPH. All applications for a permit to construct a non-transient, non-community public water system must contain information relative to its financial, managerial, and technical capability to meet all drinking water regulations.

Source Water Protection Program

IDPH has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted at more than 4,100 non-community water supplies and continue to be conducted. All new wells and surface water supplies are evaluated as to their vulnerability to potential contamination.

Monitoring Requirements

In Illinois, NCWS systems are notified of their sampling requirements through schedule letters and during the sanitary survey process. Sample schedule letters are sent for coliform and nitrate monitoring requirements and for all non-transient chemical monitoring requirements. The notification by letter of coliform schedules was new in 2022 as this was previously provided during sanitary surveys only. All monitoring schedules are available in drinking water watch and can be accessed at all times.

Operator Certification Program

IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems in order to ensure that drinking water systems are properly operated. In State FY 2023 Illinois had 385 fully certified NTNCWS operators. An operator certified as competent by IDPH must be able to perform duties without endangering public health. In order to be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified by Illinois EPA as a public water supply operators. Certified operators shall be re-certified every three years. In order to be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session. New operator certification course and re-certification course providers both have provided virtual courses during the pandemic and will continue to have this ability as needed.

Technical Assistance

IDPH Regional Offices and Local Health Department offices working for IDPH regularly provide technical assistance to NCWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone and e-mail received from NCWS systems throughout the year. The IDPH central office also answers questions and gives assistance over the phone to NCWS systems on a routine basis.

In addition, IDPH refers systems with well problems to licensed well contractors for wells experiencing contamination issues. On particularly difficult well contamination problems, central office staff accompanies inspectors in the field to explain regulations and offer solutions to NCWS owners and operators.

IDPH also refers water systems to RCAP and IRWA as the need and opportunity arise. At the June 12, 2022 IRWA 2023/2024 Operational Planning Meeting, IRWA committed to do technical visits at a group of NCWS with challenging compliance issues in State Fiscal Year 2024.

Identification of Systems in Need of Assistance

CWS

Illinois utilizes the various tools identified in this report to assist CWS systems in acquiring and maintaining TMF capacity. Illinois EPA keeps track of deficiencies found using some of these tools with a combination of the Critical Review List and the Master NOV Database. All enforcement actions are tracked using the Master NOV Database as mentioned previously. Table B lists all violations in the Master NOV Database for State FY 2023. The Illinois EPA continues to review the Master NOV Database and Critical Review List annually to identify common trends in CWS statewide capacity concerns.

Critical Review is defined in 35 Ill. Adm. Code 602.107 as the Illinois EPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or Illinois EPA's rules. Any CWS placed on the Critical Review/Restricted Status List is sent a notification letter. The Illinois EPA publishes a copy of this list on its website and updates regularly. The Board publishes the list in the Environmental Register. A copy of the most updated Critical Review List as of August 2023 can be found in Table C of this report.

The Illinois EPA has begun to train field staff to utilize SDWIS to track CWS inspection deficiencies as discussed in Section 3.1.1 of this report under Engineering Evaluations. In the future, the Illinois EPA plans to use the data in SDWIS to track capacity concerns and compare to baseline data to determine trends.

NCWS

IDPH utilizes the various tools identified in Section 3.1.2 of this report to assist NCWS systems in acquiring and maintaining TMF capacity. IDPH keeps track of violations cited and reported using SDWIS/State and develops reports and spreadsheets with the various violation types listed. All violations and enforcement actions are tracked using SDWIS/State and IDPH is able to query the data with an interactive Access database.

IDPH developed a new enforcement standard operating procedure (SOP) and began implementing this SOP last fiscal year. This SOP allows IDPH to identify systems with the highest priority of non-compliance. Another tool IDPH has developed is the NOV report, Table G. This report identifies all NOVs issued and the violations cited in the Notice. Those NOVs that are still open are candidates for critical need of assistance. Table H details the number of the violation types that are included in the NOVs.

IDPH will begin an annual review of the information in the NOV report (violation types and totals) to identify statewide trends and capacity concerns. This initial listing will be used as a baseline. This initial baseline shows the areas with the most violations are nitrate monitoring and reporting, seasonal startup followed by lack of a certified operator and coliform monitoring and reporting.

Assistance Approach

CWS

As discussed previously, Illinois EPA field staff provide technical assistance to systems with violations or deficiencies found during site inspections. In addition, these technical assistance efforts, Illinois EPA also advises water systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to assist with.

From August 1, 2022 through July 31, 2023, IRWA held 17 cost-free training programs attended by 501 water supply officials representing 292 different water systems. The formal training programs focused on the lead and copper rule requirements, operation and maintenance, state rules and regulations and sanitary surveys. IRWA spent over 382 hours conducting one-on-one technical assistance with water supply officials. In excess of 90 hours of this time was with systems considered "overburdened". IRWA specialists placed emphasis on assisting community water supplies with the DWSRF program and compliance activities. Twenty hours were spent on emergency planning and requests for "emergency" assistance. Five on-site technical assistance efforts resulted in the development of written case studies that document the needs of respective systems.

The Illinois EPA sorted data from the Master NOV Database for State FY 2023 (Table B) and data from the August 2023 Critical Review List (Table C) and included the data in Table E. Table D is considered the baseline data for CWS for Illinois. By far, the highest number of deficiencies for State FY 2023 in Table E was for systems with only one well. The number of systems with only one well increased slightly from last year most likely due to further investigative efforts. The Illinois EPA plans to reduce the number of systems with one well by offering principal forgiveness to systems to obtain a second water source. The loan requires applicants to justify source alternatives. By requiring systems to provide the alternative justification the Illinois EPA hopes to encourage systems to consider consolidation.

Other categories in Table E that show a significant increase in capacity issues are managerial capacity, monthly operating report submissions, cross connection control, emergency operation plans, and missing permits. These significant increases are due to the Agency assessing violations to thirty CWS operated within correctional facilities in Illinois. The Illinois EPA conducted sanitary surveys at correctional facilities operating CWS systems that had not recently been inspected. The Illinois EPA issued Violations Notices for violations of the Safe Drinking Water Act and Illinois Environmental Protection Act and accompanying regulations to thirty correctional centers operating CWS systems within the facilities over the course of the past year, and has entered into Compliance Commitment Agreements with each facility. Some of the other categories in Table E were combined and new categories were added for nitrification action plans, flushing programs, and other technical deficiencies.

Training provided by IRWA has been an invaluable tool for building TMF capacity for Illinois' CWS. The Illinois EPA plans to explore the possibility of increasing the amount of Drinking Water State Revolving Fund set-asides to provide technical assistance to public water supplies and provide funding to IDPH to support technical assistance for non-community water systems.

NCWS

IDPH will continue to provide technical assistance during sanitary surveys and through phone and e-mail contact with NCWS Systems. Phone and e-mail contact is made frequently with systems cited for deficiencies, violations of drinking water rules and having difficulties meeting drinking water contaminant standards. The IDPH Division of Environmental Health has a Monthly Activity Report (MARS) that documents assistance telephone calls/e-mails with IDPH regulated entities from both Central Office and Regional Office Staff. IDPH will pursue using this as a tool to provide an output of Capacity Development Program activities for providing technical assistance to NCWS from both IDPH Central Office and IDPH Regional Offices.

IDPH did not utilize RCAP or IRWA for on-site assistance in this reporting period. However, IDPH obtained a commitment at the June 12, 2023 IRWA 2023/2024 operational planning meeting for technical assistance visits to two schools with difficult compliance treatment issues and the 8 surface water systems that also have challenging compliance issues. IDPH is hopeful these visits will be fruitful and will continue to look for opportunities to refer NCWS systems with these difficult compliance issues to RCAP or IRWA for on-site assistance.

The American Camp Association – Illinois, an IDPH stakeholder, requested IDPH to participate in a member virtual meeting last reporting period (2021/2022) to provide an overview of regulatory requirements for campgrounds and youth camps classified as NCWS. A meeting was not scheduled this reporting period, but IDPH will look to renew this meeting in the 2023/2024 reporting period.

IDPH continues to coordinate across programs to encourage compliance with drinking water regulations. In the 2022/2023 reporting period, campgrounds and youth camps were again not issued operating license renewals if they operated a NCWS in non-compliance status. This has been helpful in returning many systems to compliance for violations of the drinking water regulations. It has also been helpful to educate many campground and youth camp NCWS owners and managers on drinking water regulations and capacity issues. The IDPH licensing program renewal notice forewarns campgrounds and youth camps that are NCWS systems that water system non-compliance will hold up their camp renewal. This provokes many NCWS owners and managers to find out what is needed to remain in compliance.

Three NCWS participated in a pilot project to develop Asset Management Plans with RCAP and EFC in summer and fall of 2022. Two of these systems were Constellation Energy Systems an IDPH Stakeholder. RCAP and EFC worked directly with these NCWS

to do an Asset Management Review of these systems which included the five-core question framework and produce an Asset Management Plan with recommendations for the NCWS to implement.

On March 28 through March 30, 2023, EFC offered a free on-line training course for Asset Management to small water systems in Illinois. IDPH promoted this training and offered continuing education credit to NCWS certified operators. This effort proved successful as nearly 40 IDH certified operators attended this training session. The training was well received by the operators and was very informative and comprehensive on the benefits of Asset Management.

The Illinois Capacity Development strategy requires IDPH to work to add an asset management section to the sanitary survey checklist. If the TMF pre-screening survey finds that the public water system does not have an asset management plan that incorporates all components of the five-core-question framework, then a recommendation will be added to the sanitary survey inspection letter advising the public water system to address this deficiency. IDPH has been delayed in implementing this component of the strategy for a couple reasons. First, as noted in 3.1.2, IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report Significant Deficiencies and required corrective actions in SDWIS/State. This procedure has taken some time and effort to develop, delaying work on the TMF pre-screening checklist. Second, IDPH has had difficulty finding TMF pre-screening checklists applicable to NCWS. IDPH will continue to work on adding this procedure of the strategy in State Fiscal Year 2024.

Implementation Review

CWS
The Illinois EPA has conducted a review of the existing system implementation strategy and found numerous areas that may be improved upon. These areas include, but are not limited to, continuing to provide training to field staff on how to utilize SDWIS to track deficiencies noted during site-inspections, documenting technical assistance activities, exploring the possible use of additional set-asides to fund technical assistance efforts, and exploring the possibility of requiring CWS systems to develop asset management plans.

NCWS
The IDPH has conducted a review of implementation of the existing system strategy and found some areas that may be improved upon. These areas include but are not limited to the following: continuing to look for more opportunities to utilize RCAP or IRWA for on-site assistance; continuing to look for viable options to provide financial planning assistance for NCWS systems including a pre-screening sanitary survey checklist that incorporates the 5-core-question framework; and continuing to incorporate stakeholder involvement. In addition, IDPH will pursue, using it's MARS Report as a tool, providing an output of Capacity Development

Program activities and technical assistance. When these items are implemented, the existing capacity development strategy will be updated.

Modifications to Existing Strategy

CWS
Illinois did make modifications to the existing CWS strategy in State FY 2023. These modifications include updating the TMF pre-screening survey, adding an asset management plan recommendation to FOS non-compliance letters, using SDWIS to track inspection deficiencies, documenting technical assistance efforts in the field, and adding a section on asset management and climate change adaptation to this report. Illinois EPA has also modified its strategy to place a higher priority on building TMF capacity and providing technical assistance to Environment Justice communities and other small and disadvantaged CWS. In addition, in FY23, Illinois EPA inspected thirty CWS operated within Illinois correctional facilities, and has entered into Compliance Commitment Agreements requiring a date-certain return to compliance by those CWS. In addition, Illinois EPA is providing technical assistance to these CWS via its field offices and technical assistance partnerships.

NCWS
Illinois is providing the NOV report, which details NOVs issued and violations cited, in Table G. Table H details the violation types and numbers that caused NOVs to be issued. In addition, IDPH is implementing a new Sanitary Survey SOP that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This SOP will be effective by September 30, 2023.

Summary

Illinois has developed a strong Capacity Development program, and is continuing its efforts to build TMF capacity in Illinois' CWS. These efforts, largely accomplished via work done by the Field Operations Section, Compliance Assurance Section, and Technical Assistance partners, have resulting in building capacity at many systems that have a history of noncompliance and are small and disadvantaged CWS. Illinois EPA is striving to support communities that need assistance most, such as Environmental Justice Communities and small and disadvantaged systems by prioritizing sanitary surveys, technical assistance, and enforcement where necessary, at these CWS. Technical assistance has provided much-needed support in the form of trainings and the development of emergency operations plans, asset management plans, and compliance assistance for monitoring and lead service line inventories. Illinois continues to invest in system restructuring, training efforts, source water assessment and protection plans, and utilizes the DWSRF program to the best of its ability to aid Illinois' CWS. Many Illinois CWS continue to face significant funding and technical capacity challenges. As regulatory requirements continue to increase, such as with the promulgation of regulations for emerging

contaminants, CWS struggle to meet the financial burden of installing treatment and upgrading aging water treatment plants. In addition, as aging certified operators retire and leave the workforce, CWS are struggling to hire new operators. The Illinois EPA and the Public Water Supply Operator Advisory Board remain concerned that the technical capacity of water systems will be greatly affected as operators retire. Again, Illinois EPA views its training partners as important tools in building TMF capacity to address these continuing challenges for Illinois' PWS.

This report is available to the public at EPA (illinois.gov).

4.0 Tables

TABLE A

New CWS Systems State FY 2021 Through State FY 2023

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Dates	ETT Score >11
IL0150030	Thomson Maximum Security Center	Active	6/8/2023	Existing facility, no new infrastructure built	No
IL0815110	Rolling Meadows MHP (Jefferson CO)	Active	4/17/2023	Existing facility, no new infrastructure built	No
IL1635055	Arapaho Village MHP	Active	4/5/2023	Existing facility, no new infrastructure built	No
IL1990560	Marion Mobile Home Village	Active	3/24/2023	Existing facility, No new infrastructure built	No
IL1795030	UAW Senior Citizens Center	Active	3/24/2023	Existing facility, no new infrastructure built	No
IL0430055	Aqua Illinois – Oak Brook	Pending	3/16/2023	Existing facility, no new infrastructure built	No
IL1934000	W2E Water Coop	Pending	2/28/2023	New CWS, capacity demonstration needs to be submitted	No
IL1010010	Lawrence County Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL0210010	Taylorville Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL1670200	Cottonwood Cove MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL1670225	Forrest Park MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0317010	Harbor Point Estates MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0971540	Cambridge Courts MHP	Active	9/30/2022	Existing facility, no new infrastructure built	No

IL1670260	United Regional Water Coop	Active	9/1/2022	New CWS, Capacity Demonstration Approved 11/6/2020	No
IL1970460	Joliet Inpatient Treatment Center	Active	8/30/2022	Existing facility, no new infrastructure built	No
IL1815500	Choate MHC	Active	6/21/2022	Existing facility, no new infrastructure built	No
IL1115125	Oakbrook Estates MHP	Active	5/11/2022	Existing facility, no new infrastructure built	No
IL0978970	LCPW – Oak Terrace	Active	5/4/2022	Existing facility, no new infrastructure built	No
IL0075185	Four Seasons MHP	Active	4/6/2022	Existing facility, no new infrastructure built	No
IL1631150	Valley View Estates	Active	2/18/2022	Existing facility, no new infrastructure built	No
IL1590220	Acorn Acres MHP	Active	11/9/2021	Existing facility, no new infrastructure built	No
IL1635000	Cahokia Heights	Active	8/6/2021	Existing facility, no new infrastructure built	No
IL0810200	Oak Grove Village	Active	7/12/2021	Existing facility, no new infrastructure built	No
IL1635060	Meadowbrook MH Community, LLC	Active	3/23/2021	Existing facility, no new infrastructure built	No
IL0890080	Recovery Centers of America	Active	11/24/2020	Existing facility, no new infrastructure built	No
IL0971700	Brookdale Senior Living – Vernon Hills	Active	11/18/2020	Existing facility, no new infrastructure built	No
IL0830020	IL Alluvial Regional Water Company	Pending	11/2/2020	New CWS, Capacity Demonstration Approved 12/23/2022	No
IL1150160	Decatur MHP, LLC	Active	7/8/2020	Existing facility, no new infrastructure built	No

TABLE B

CWS State FY 2023 Violations Issued *

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
ABINGDON	IL0950050	W-2022-00067	FAILURE TO PREPARE, DISTRIBUTE 2022 CCR WITH ALL REQUIRED CCR ELEMENTS	12/8/2022
ALMA	IL1210050	W-2022-00069	FAILURE TO DISTRIBUTE CCR ACCORDING TO MOD WITH ALL ELEMENTS AND FAILURE TO COLLECT BACTI SAMPLE	12/7/2022
AQUA ILLINOIS-OAK RUN	IL0955200	W-2023-00001	CHLORINE FEED RATE IS ABOVE MAXIUM DOSAGE RATE	1/17/2023
BARDOLPH	IL1090050	W-2023-00015	EXCEEDANCE OF LRAA MCL FOR TTHM	2/15/2023
BEECHER CITY	IL0490100	W-2023-00021	EXCEEDANCE OF LRAA MCL FOR TTHM'S AND HAA5'S	4/14/2023
BETHALTO	IL1190150	W-2022-00061	FAILURE TO MONITOR ANNUAL DBP'S DURING THE PEAK HISTORICAL MONTH	11/18/2022
BIG MUDDY RIVER CORRECTIONAL CENTER	IL0810020	W-2023-00030	MULTIPLE FOS VIOLATIONS	5/3/2023
BISHOP HILL	IL0730250	W-2023-00002	MISSING OPERATING AND CONSTRUCTION PERMITS	1/18/2023
BOWEN	IL0670200	W-2022-00045	Failed to maintain WQP Ranges	10/3/2022
BROWNSTOWN	IL0510100	W-2023-00022	EXCEEDANCE OF LRAA MCL OR TTHM; FAILURE TO MONITOR COLIFORM/CHLORINE RESIDUAL	3/17/2023
BUCKLEY	IL0750150	W-2023-00036	FAILURE TO OBTAIN A CONSTRUCTION PERMIT FOR A WATERMAIN EXTENSION	5/31/2023
CAMP POINT	IL0010050	W-2022-00044	FAILURE TO MAINTAIN WQP RANGES	10/3/2022
CENTRALIA CORRECTIONAL SITE	IL0275600	W-2023-00032	MULTIPLE VIOLATIONS FROM FOS	4/18/2023
CHENOA	IL1130300	W-2023-00014	EXCEDANCE OF LRAA MCL FOR TTHM	2/15/2023
CHRISMAN	IL0450100	W-2022-00066	FAILURE TO SUBMIT OCCT RECOMMENDATION, LEAD CONSUMER NOTICE AND PUBLIC EDUCATION	11/29/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
CISCO	IL1470150	W-2023-00016	FAILURE TO RECOMMEND THE INSTALLATION AND OPERATION OF SOURCE WATER TREATMENT	6/16/2023
Clayton Work Camp	IL0010150	W-2023-00025	MULTIPLE VIOLATIONS FROM FOS	3/31/2023
CLAYTON-CAMP-POINT WATER COMMISSION	IL0015200	W-2022-00056	FAILURE TO PROPERLY FEED ORTHOPHOSPHATE AT CALCULATED DOSAGE RATE OF 2.5 MG/L OR GREATER	10/5/2022
CUTLER	IL1450050	W-2022-00047	VIOLATIONS FROM FOS	9/7/2022
DANVILLE CORRECTIONAL CENTER	IL1835400	W-2023-00034	MISC FROM FOS	4/21/2023
DECATUR CORRECTIONAL CENTER	IL1150140	W-2023-00009	FAILURE TO HAVE A NAP, CC PROGRAM, EMERGENCY OPERATIONS PLAN, FLUSHING PROGRAM AND TO SUBMIT MORS	2/6/2023
DES PLAINES MHP	IL0317775	W-2022-00048	EXCEEDING THE GROSS ALPHA MCL AT TP01	8/26/2022
DIXON CORRECTIONAL CENTER	IL1035500	W-2023-00038	MULTIPLE FOS VIOLATIONS	5/16/2023
EAST DUNDEE	IL0890250	W-2022-00060	FAILURE TO SUBMIT MONTHLY OPERATING REPORTS	12/27/2022
EAST MOLINE CORRECTIONAL CENTER	IL1617120	W-2023-00042	MISC FROM FOS	5/19/2023
EDINBURG	IL0210150	W-2022-00071	EXCEEDANCE OF LRAA MCL FOR TTHM	1/4/2023
FORD HEIGHTS	IL0310720	W-2022-00065	FOS VIOLATIONS	12/14/2022
FRANKLIN GROVE	IL1030250	W-2023-00003	LACK OF CERTIFIED OPERATOR	1/27/2023
GRAHAM CORRECTIONAL SITE	IL1355100	W-2023-00020	MULTIPLE SIGNIFICANT DEFICIENCIES FROM FOS	2/21/2023
HILL CORRECTIONAL CENTER	IL0950010	W-2023-00033	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/18/2023
HILLTOP MHP	IL1130080	W-2022-00068	FAILURE TO PREPARE AND DISTRIBUTE ALL REQUIRED CCR ELEMENTS	12/13/2022
IL RIVER CORRECTIONAL CENTER	IL0570020	W-2023-00026	MISC FROM FOS	3/31/2023
JACKSONVILLE CORRECTIONAL CENTER	IL1375200	W-2023-00023	MULTIPLE FOS VN	3/31/2023
JASPER WATERWORKS CORPORATION	IL1910020	W-2022-00058	FAILURE TO MAINTAIN A MINIMUM COMBINED CHLORINE RESIDUAL OF 1.0 MG/L IN ALL PARTS OF DISTRIBUTION.	10/19/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
JOLIET INPATIENT TREATMENT CENTER	IL1970460	W-2023-00010	LACK OF CROSS CONNECTION CONTROL PROGRAM, MISSING MONTHLY OPERATING REPORTS, NO BACTERIOLOGICAL PLAN	2/10/2023
KEWANEE LSRC	IL0730650	W-2023-00044	MISC FROM FOS	5/19/2023
LAWRENCE COUNTY CORRECTIONAL CENTER	IL1010010	W-2023-00011	MULTI FOS VN	2/7/2023
LEROY	IL1130750	W-2023-00041	EXCEEDANCE OF LRAA MCL FOR HAA5/FAILURE TO PROVIE PUBLIC EDUCATION	6/2/2023
LINCOLN CORRECTIONAL CENTER	IL1075450	W-2023-00029	FOS INSPECTION VIOLATIONS	4/21/2023
LOGAN CORRECTIONAL CENTER	IL1075520	W-2023-00013	MULTIPLE VIOLATIONS FROM FOS	2/14/2023
MARENGO	IL1110650	W-2022-00042	FAILURE TO PROVIDE SAFE SOURCE OF WATER, FAILURE TO FULFILL CONDITIONS OF SEP	8/24/2022
MENARD CORRECTIONAL CENTER	IL1575550	W-2023-00039	MULTIPLE VIOLATIONS FROM FOS	5/15/2023
MOKENA	IL1970600	W-2022-00055	FAILURE TO COMPLETE CROSS CONNECTION SURVEY	12/14/2022
MULBERRY GROVE	IL0050100	W-2022-00046	HAA5 MCL EXCEEDANCE	8/26/2022
MUNDELEIN	IL0971150	W-2022-00050	FAILURE TO COMPLETE TRENNIAL CROSS-CONNECTION SURVEYS	8/30/2022
MURDALE PWD	IL1910020	W-2022-00059	FAILURE TO PROVIDE 10' OF HORIZONTAL SEPARATION AND FAILURE TO OBTAIN SUPPLEMENTAL APPROVAL	12/27/2022
MURPHYSBORO LSRC	IL0770500	W-2023-00040	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/28/2023
NEW PIASA CHAUTAUQUA PWS	IL0830010	W-2023-00004	FAILURE TO SUBMIT AN OPERATOR CONTRACT	1/24/2023
NICOR GAS, TROY GROVE STATION, NORTH STRUCTURE	6370	W-2023-00027	GROUNDWATER QUALITY STANDARDS EXCEEDANCES	3/21/2023
NOBLE	IL1590150	W-2022-00039	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
NORTH CHICAGO	IL0971250	W-2023-00046	EXCEEDANCE OF LRAA MCL FOR TTHM	6/13/2023
NORTHMEADOW VILLAGE MHP	IL1130060	W-2022-00057	FAILURE TO PREPARE AND DISTRIBUTE A 2022 CCR THAT INCLUDES ALL REQURIED CCR ELEMENTS	10/3/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
PINCKNEYVILLE CORRECTIONAL CENTER	IL1450010	W-2023-00024	MULTIPLE FOS VN	4/21/2023
Pittsfield WC	IL1490760	W-2023-00028	MISC FROM FOS	4/18/2023
PONTIll. Adm. Code CORRECTIONAL CENTER	IL1055500	W-2023-00008	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/6/2023
POSEN	IL0312520	W-2022-00051	FAILURE TO CONDUCT TRIENNIAL CROSS-CONNECTION SURVEY AND ANNUAL BACKLOW DEVICE TESTING	8/30/2022
RAMSEY	IL0510200	W-2023-00035	EXCEEDANCE OF LRAA MCL FOR HAA5	5/10/2023
ROBINSON CORRECTIONAL CENTER	IL0330010	W-2023-00007	FOS VIOLATIONS FROM INSPECTION	2/6/2023
ROCKDALE	IL1970850	W-2022-00062	FAILURE TO SAMPLE QUARTERLY FOR LEAD SEQUENTIAL PROFILING	11/28/2022
SAYBROOK	IL1130950	W-2023-00017	FAILURE TO OBTAIN CONSTRUCTION PERMIT AND OPERATING PERMIT FOR NEW ELEVATED TANK	3/9/2023
SHAWNEE CRCTL CNTR	IL0870010	W-2023-00019	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/14/2023
SHERIDAN CRCTL CNTR	IL0995840	W-2022-00072	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/27/2022
SOUTH JACKSONVILLE	IL1370400	W-2022-00043	FAILURE TO PROVIDE SAFE SOURCE OF RAW WATER	8/25/2022
SOUTHWESTERN IL CORRECTIONAL CENTER	IL1630030	W-2023-00037	MISC FROM FOS FOR DOC FACILITY	5/3/2023
ST ROSE PWD	IL0275250	W-2022-00063	FAILURE TO SEPARATE WATER WITH A FREE CHLORINE RESIDUAL FROM WATER WITH COMBINED.	11/28/2022
STATEVILLE CORRECTIONAL CENTER		W-2022-00073	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	1/9/2023
SUGAR GROVE	IL0890850	W-2023-00045	EXCEEDANCE OF MANGANESE STATE ONLY MCL AT TP01	5/15/2023
TAYLORVILLE CORRECTIONAL CENTER	IL0210010	W-2023-00012	MULTIPLE VN FROM FOS	2/21/2023
VANDALIA CORRECTIONAL CENTER	IL0510350	W-2023-00043	MISC FROM FOS	5/19/2023
VIENNA	IL0875510	W-2022-00070	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/13/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
WADSWORTH OAKS SUBDIVISION	IL0977320	W-2023-00005	FAILURE TO COMPLETE PREVIOUSLY NOTED ON-GOING VIOLATIONS	1/18/2023
WAUKEGAN	IL0971900	W-2022-00041	FAILURE TO COMPLETE A CORROSION CONTROL STUDY	8/4/2022
WEST LIBERTY-DUNDAS WATER DISTRICT	IL1595050	W-2022-00040	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
WESTERN IL CORRECTIONAL CENTER	IL0090010	W-2023-00018	MULTIPLE VIOLATIONS FROM FOS	2/27/2023
WESTERN SPRINGS	IL0313180	W-2022-00064	FAILURE TO SUBMIT CCR ELEMENTS AND FAILURE TO SUBMIT MORS	12/13/2022
WILDWOOD MHP	IL0775410	W-2023-00006	LACK OF AN APPROVED OPERATOR CONRACT	4/27/2023
WILLOW CREEK NORTH MHP	IL1135130	W-2022-00054	LACK OF A CERTIFIED OPERATOR	11/10/2022

*If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table E

TABLE C

Illinois EPA DPWS Critical Review List August 2023

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
AIR VIEW MHP	IL1615185	1	NO BACKUP SOURCE	164	8/7/2020
ANCHOR	IL1130050	4	ONLY ONE WELL	155	8/28/2020
AQUA ILLINOIS - HIGHLAND ESTATES	IL0915220	2	ONLY ONE WELL	171	1/13/2021
AQUA ILLINOIS - INDIANOLA	IL1830500	4	ONLY ONE WELL	224	12/11/2020
AQUA ILLINOIS - SKYLINE	IL0915450	2	ONLY ONE WELL	208	1/8/2021
AQUA ILLINOIS - SUN RIVER TERRACE	IL0910720	2	ONLY ONE WELL	495	1/13/2021
BEAVER CREEK VILLAGE MHP	IL0755125	4	ONLY ONE WELL	48	1/6/2021
BROWNING	IL1690050	5	ONLY ONE WELL	175	12/2/2020
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	5	ONLY ONE WELL	45	7/22/2020
BUSY BEE MHP #1	IL1975195	2	ONLY ONE WELL	25	12/4/2020
CAMP GROVE	IL1235100	1	ONLY ONE WELL	75	6/24/2020
CANTON	IL0570250	5	INADEQUATE TREATMENT CAPACITY	13932	3/15/2007
CAPRON MHP	IL0075105	1	ONLY ONE WELL	98	1/27/2021
CARBON HILL	IL0630100	2	INADEQUATE TREATMENT CAPACITY	392	12/14/2016
CARROLL HEIGHTS UTILITIES COMPANY	IL0155200	1	ONLY ONE WELL	80	1/27/2021
CARTHAGE*	IL0670250	5	ONLY ONE WELL	2605	4/11/2023
CEDAR BROOK ESTATES SUBDIVISION	IL1615170	1	ONLY ONE WELL	200	8/7/2020
CEDAR POINT WATER COMPANY	IL0995040	1	ONLY ONE WELL	300	8/26/2020
CEDAR WATER COMPANY, INC.	IL0955150	5	ONLY ONE WELL	160	1/13/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
CENTURY PINES APARTMENTS	IL0150020	1	ONLY ONE WELL	25	1/27/2021
CHAIN-O-LAKES MHP	IL0975165	2	ONLY ONE WELL	81	8/28/2020
CHERRYDALE SUBDIVISION	IL1615120	1	ONLY ONE WELL	80	8/5/2020
CHIGAKWA PARK ESTATES	IL1615140	1	ONLY ONE WELL	53	8/7/2020
CLARKS MHP	IL2015425	1	ONLY ONE WELL	80	12/4/2020
COAL CITY	IL0630200	2	INADEQUATE TREATMENT CAPACITY	5587	12/14/2016
COLONIAL MEADOWS	IL1135100	6	ONLY ONE WELL	190	9/26/2020
COUNTRY LANE MHP	IL1135385	4	ONLY ONE WELL	35	6/24/2020
COUNTRY VIEW ESTATES MHP	IL0195625	4	ONLY ONE WELL	97	1/27/2021
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	1	ONLY ONE WELL	120	7/15/2020
DE WITT	IL0390100	4	ONLY ONE WELL	200	1/27/2021
DIXIE ESTATES SUBDIVISION	IL1975520	2	ONLY ONE WELL	180	12/9/2020
DONNY BROOK ESTATES	IL0375150	1	ONLY ONE WELL	30	1/27/2021
DONOVAN	IL0750400	4	ONLY ONE WELL	306	1/6/2021
EAST END WATER ASSOCIATION	IL1610140	1	ONLY ONE WELL	40	7/31/2020
EAST LAWN WATER ASSOCIATION	IL1615100	1	ONLY ONE WELL	160	8/5/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
EVERGREEN VILLAGE SUBDIVISION	IL1615310	1	ONLY ONE WELL	130	8/12/2020
FOUR STAR CAMPGROUND	IL0990060	1	ONLY ONE WELL	150	8/26/2020
FOX CREEK FARMS WATER COMPANY	IL1435750	5	ONLY ONE WELL	221	7/29/2020
FOX LAWN HOMEOWNERS WATER ASSOCIATION	IL0935150	2	ONLY ONE WELL	167	1/13/2021
FRENTRESS LAKE	IL0850010	1	ONLY ONE WELL	150	1/8/2021
GARDEN STREET IMPROVEMENT ASSOCIATION	IL1975376	2	ONLY ONE WELL	54	12/9/2020
GREEN ACRES MHP	IL1035165	1	ONLY ONE WELL	200	8/26/2020
HARMON	IL1030300	1	ONLY ONE WELL	149	8/26/2020
HAZELWOOD 4TH ADDITION	IL0735350	1	ONLY ONE WELL	135	1/6/2021
HAZELWOOD WEST SUBDIVISION	IL0735250	1	ONLY ONE WELL	70	1/6/2021
HEATHERFIELD SUBDIVISION	IL0635150	2	ONLY ONE WELL	90	1/29/2021
HICKORY HILLS 2ND ADDITION WATER ASSOCIATION	IL0730080	1	ONLY ONE WELL	93	8/12/2020
HICKORY HILLS 2ND ADDITION*	IL1615450	1	ONLY ONE WELL	42	7/28/2023
HIGHLAND LAKE WATER COMPANY	IL0970255	2	ONLY ONE WELL	36	8/26/2020
HIGHLAND SUBDIVISION	IL0895530	2	ONLY ONE WELL	40	1/8/2021
HILLCREST	IL1410250	1	INADEQUATE STORAGE CAPACITY	1400	11/2/2017
HILLSDALE ESTATES, LLC	IL1615530	1	ONLY ONE WELL	63	8/14/2020
HILLSDALE PROPERTIES	IL1615728	1	ONLY ONE WELL	60	6/24/2020
HOLLANDS GROVE COURT SUBDIVISION	IL1795300	5	ONLY ONE WELL	40	12/2/2020
HOLLY HOCK HILL MHP	IL0975245	2	ONLY ONE WELL	52	8/28/2020
HOPEWELL	IL1235150	1	ONLY ONE WELL	420	7/1/2020
IL AMERICAN - LEONORE	IL0990400	1	ONLY ONE WELL	111	8/26/2020
IL AMERICAN - MIDWEST PALOS	IL0317050	2	ONLY ONE WELL	143	1/27/2021
IL AMERICAN - NETTLE CREEK	IL0630040	2	ONLY ONE WELL	285	1/29/2021
IL AMERICAN - RIDGECREST	IL0635100	2	ONLY ONE WELL	219	1/29/2021
IL PRAIRIE ESTATE SBDV WATER ASSN	IL0995300	1	ONLY ONE WELL	112	8/26/2020
INDIAN BLUFFS SUBDIVISION	IL1615520	1	ONLY ONE WELL	150	8/14/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
INDIAN CREEK HOMEOWNERS AND WATER ASSN	IL1135250	4	ONLY ONE WELL	240	6/17/2020
IROQUOIS MOBILE ESTATES, INC.	IL0755185	4	ONLY ONE WELL	105	1/8/2021
JOHNSBURG 1	IL1110040	2	ONLY ONE WELL	174	8/28/2020
KENNEY	IL0390200	4	ONLY ONE WELL	374	1/29/2021
KNOLLS EDGE SUBDIVISION	IL1415250	1	ONLY ONE WELL	100	7/17/2020
LAFAYETTE	IL1750100	1	ONLY ONE WELL	250	12/2/2020
LAKE LYNWOOD WATER SYSTEM	IL0735330	1	ONLY ONE WELL	75	1/6/2021
LAKE SHANNON	IL0910020	2	ONLY ONE WELL	500	1/13/2021
LAKE WILDWIND LLC	IL2035125	1	ONLY ONE WELL	200	12/4/2020
LAND AND WATER ASSOCIATION	IL0995050	1	ONLY ONE WELL	100	8/26/2020
LASALLE	IL0990300	1	INADEQUATE SOURCE CAPACITY & INADEQUATE TREATMENT CAPACITY	9700	11/1/2004
LINDENWOOD WATER ASSOCIATION	IL1415300	1	ONLY ONE WELL	35	7/22/2020
LISBON NORTH, INC.	IL0631000	2	ONLY ONE WELL	25	1/29/2021
LYNN WATER ASSOCIATION	IL0735100	1	ONLY ONE WELL	42	1/8/2021
LYNNWOOD WATER CORPORATION	IL0995336	1	ONLY ONE WELL	110	8/26/2020
LYNWOOD 3RD ADDITION	IL0735280	1	ONLY ONE WELL	100	1/6/2021
M C L W SYSTEM, INC.	IL1315150	1	ONLY ONE WELL	98	7/10/2020
MACOMB	IL1090350	5	INADEQUATE CLARIFIER CAPACITY	11309	12/14/2016
MAQUON	IL0950350	5	ONLY ONE WELL	284	1/13/2021
MARSEILLES SOUTH	IL0990110	1	ONLY ONE WELL	100	8/26/2020
MASON CITY	IL1250350	5	INADEQUATE STORAGE CAPACITY	2558	1/1/2006
MAYFAIR SUBDIVISION	IL1795750	5	ONLY ONE WELL	90	12/11/2020
MAZON**	IL0630500	2	NEAR A MANGANESE MCL VIOLATION	987	7/8/2022
MC NABB	IL1550150	1	ONLY ONE WELL	310	6/11/2020
MILL POINT MHP	IL2035165	1	ONLY ONE WELL	160	12/4/2020
MOUND CITY	IL1530100	7	ONLY ONE WELL	588	6/5/2020
MOUND PWD	IL1635050	6	INADEQUATE PLANT CAPACITY	2200	6/17/1996
MOUNT MORRIS ESTATES MHP	IL1415185	1	ONLY ONE WELL	395	7/15/2020
MOUNT VERNON ASSOCIATION INC.	IL0855100	1	ONLY ONE WELL	490	1/8/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
NORTH HAZELWOOD SUBDIVISION	IL0735850	1	ONLY ONE WELL	100	1/8/2021
NORTH HENDERSON	IL1310300	1	ONLY ONE WELL	187	7/2/2020
OAK GROVE MHP - ROCK ISLAND COUNTY	IL1617785	1	ONLY ONE WELL	100	12/2/2020
OAK VIEW ESTATES	IL0730120	1	ONLY ONE WELL	95	1/29/2021
OAKWOOD WEST SUBDIVISION	IL0730070	1	ONLY ONE WELL	45	1/29/2021
OLNEY	IL1590200	7	INADEQUATE TREATMENT CAPACITY	9315	10/28/2022
OPHIEM PWS	IL0735150	1	ONLY ONE WELL	100	1/8/2021
OTTAWA ESTATES MHP	IL0995225	1	ONLY ONE WELL	115	8/26/2020
PARADISE MANOR MHP	IL1617665	1	ONLY ONE WELL	200	11/20/2020
PARK MEADOWLAND WEST MHP	IL0075235	1	ONLY ONE WELL	100	1/27/2021
PAULS MHP	IL0975485	2	ONLY ONE WELL	38	8/28/2020
PHIL-AIRE ESTATES MHP	IL2015625	1	ONLY ONE WELL	80	12/4/2020
POLO DR AND SADDLE RD SUBDIVISION	IL0437000	1	ONLY ONE WELL	93	1/29/2021
PORT BARRINGTON SHORES SUBDIVISION	IL0971120	2	ONLY ONE WELL	67	8/26/2020
POWERS WATER CO., INC	IL0895550	2	ONLY ONE WELL	214	1/8/2021
PRAIRIE OAKS ESTATES HOMEOWNERS' ASSOCIATION	IL0630060	2	ONLY ONE WELL	107	1/29/2021
PRAIRIE PATH WATER - CAMELOT	IL1975200	2	ONLY ONE WELL	575	12/9/2020
PRAIRIE PATH WATER - CHERRY HILL WATER COMPANY	IL1975280	2	ONLY ONE WELL	624	12/9/2020
PRAIRIE VIEW WATER ASSOCIATION	IL1795900	5	ONLY ONE WELL	35	12/11/2020
QUINCY	IL0010650	5	INADEQUATE CLARIFIER CAPACITY	45000	8/3/2016
RAINBOW LANE MHP	IL2015645	1	ONLY ONE WELL	83	12/4/2020
RAINBOW RIDGE	IL1615580	1	ONLY ONE WELL	46	8/14/2020
REDDICK	IL0914780	2	ONLY ONE WELL	210	1/8/2021
RIDGEWOOD LEDGES WATER ASSOCIATION	IL1615670	1	ONLY ONE WELL	430	6/24/2020
ROLLING GREEN ESTATES MHP	IL1415245	1	ONLY ONE WELL	215	7/17/2020
RUSTIC ACRES WATER ASSOCIATION	IL0735500	1	ONLY ONE WELL	260	1/6/2021
SANTA FE ESTATES WATER ASSOCIATION	IL1435490	5	ONLY ONE WELL	84	7/29/2020
SEATON	IL1310350	1	ONLY ONE WELL	200	7/2/2020
SENECA MOBILE HOMES LLC	IL0995425	1	ONLY ONE WELL	73	8/26/2020
SHERIDAN CORRECTIONAL CENTER*	IL0995840	1	INADEQATE TREATMENT CAPACITY	1800	1/27/2023
SIX OAKS MHP	IL2015685	1	ONLY ONE WELL	48	12/4/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
SPIN LAKE HOMEOWNERS' ASSOCIATION	IL1135140	4	ONLY ONE WELL	200	6/16/2020
STELLE COMMUNITY ASSOCIATION	IL0535100	4	ONLY ONE WELL	100	1/29/2021
STORYBOOK HIGHLANDS	IL0935250	2	ONLY ONE WELL	100	1/13/2021
STRATFORD WEST APARTMENTS	IL1095200	5	ONLY ONE WELL	44	8/26/2020
STRAWN	IL1050700	4	ONLY ONE WELL	133	8/26/2020
SUBURBAN HEIGHTS SUBDIVISION	IL1615800	1	ONLY ONE WELL	57	11/20/2020
TENNANTS SHADY OAKS SUBDIVISION	IL1615540	1	ONLY ONE WELL	44	8/14/2020
TIMBER BROOK ESTATES	IL0735450	1	ONLY ONE WELL	120	1/6/2021
TIMBER RIDGE SUBDIVISION	IL0735470	1	ONLY ONE WELL	120	1/6/2021
TISKILWA	IL0111050	1	INADEQUATE STORAGE CAPACITY	830	9/20/2017
TOWER RIDGE SUBDIVISION	IL1615780	1	ONLY ONE WELL	70	11/20/2020
VALLEY VIEW MANOR**	IL0195865	4	ONLY ONE WELL	120	1/27/2021
VAN ORIN WATER COMPANY	IL0115000	1	ONLY ONE WELL	100	1/27/2021
VICTORIA	IL0950550	5	ONLY ONE WELL	316	1/13/2021
WATER WERKS	IL1615130	1	ONLY ONE WELL	90	8/5/2020
WATERMAN	IL0370600	1	ONLY ONE WELL	1506	1/27/2021
WHITE HALL	IL0610400	6	INADEQUATE STORAGE CAPACITY	2900	10/1/2012
WINDCREST SUBDIVISION	IL0730040	1	ONLY ONE WELL	40	1/29/2021
WINDING CREEK ESTATES	IL1615850	1	ONLY ONE WELL	160	11/20/2020
WINSLOW	IL1770550	1	ONLY ONE WELL	350	12/2/2020
WITT	IL1350850	5	INADEQUATE TREATMENT CAPACITY	991	3/17/2008
YATES CITY	IL0950700	5	ONLY ONE WELL	750	1/13/2021
YOUNGS HILLCREST MHP	IL0190040	4	ONLY ONE WELL	34	1/27/2021

TABLE D

2022 Baseline Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	136
Lack of Certified Operator	15
Lead and Copper	13
Monitoring	13
DBP MCL	13
Manganese MCL	9
Treatment Capacity	8
Issue CCR	7
Radium MCL	4
Storage Capacity	4
Source Capacity (not well)	3
Managerial Capacity	3
MOR Submission	3
Maintain Cl^- Residual	3
Cross Connection Program	3
Nitrate MCL	2
Material Inventory	2
Arsenic MCL	1
E. Coli MCL	1
Emergency Op Plan	1
Permit Needed	1
Back-up Power	1
Combined Filter Effluent	1
Chlorine MRDL	1
Well Abandonment	0

TABLE E

2023 Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	143
Certified Operator	10
Lead and Copper	7
Monitoring	10
DBP MCL	11
Manganese MCL	1
Plant Capacity	12
CCR	4
Radiological MCL	1
Storage Capacity	5
Source Capacity (not well)	4
Managerial Capacity	13
MOR Submission	23
Chlorination	10
Cross Connection Program	31
Nitrate MCL	0
Material Inventory	0
Arsenic MCL	0
E. Coli MCL	0
Emergency Op Plan	15
Permit Needed	11
Back-up Power	3
Flushing Program	16
Well Abandonment	1
Nitrification Action Plan	14
Flushing Program	16
Other Technical Deficiencies	15

Table F

New Non-Community Water Supplies

From State FY 2021 Through FY 2023

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162651	Swedish Covenant Hospital	A	11-7-19 – P 2-10-22 - A	No	Yes
IL3162669	Nussbaum Properties #2	A	11-8-19 – P 2-16-22 - A	No	Yes
IL3162867	Loves Travel Stop	A	1-7-20 – P 1-18-22 - A	No	Yes
IL3163121	Blessing Hospital	P	4-22-20	No	Not Active
IL3163204	Tree House Foods	P	7-10-20	No	Not Active
IL3163147	SERENITY HOSPICE & HOME	A	7-22-20	No	Yes
IL3163287	Illinois Marine Towing	P	10-9-20	No	Not Active
IL3163311	Blunier Builders	P	10-30-20	No	Not Active
IL3163360	ST PETER LUTHERAN CHURCH/SONSHINE CHRIST	A	11-6-20 – 8-18-22 -changed to Transient System	No	N/A
IL3162883	WEDRON SILICA PIT BUILDING	A	11-10-20	No	Yes
IL3163188	US SILICA OTTAWA SOUTH PIT	A	11-25-20	No	Yes
IL3162354	CHICAGO AUTISM ACADEMY	A	11-25-20	No	Yes
IL3163527	Morris Hospital	P	12-3-20	No	Not Active
IL3162461	AVOCATE CHRIST MEDICAL CENTER	A	12-8-20	No	Yes
IL3163162	SPANCRETE INDUSTRIES INC.	A	12-8-20	No	Yes
IL3162131	JUGANDO SE APRENDE	A	12-17-20	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162313	BRANDT INDUSTRIES USA LTD	A	12-28-20	No	Yes
IL3162610	ALLOY SPECIALTIES (10500320)	A	12-29-20	No	Yes
IL3163097	LAUNCH ENRICHMENT L3C	A	12-31-20	No	Yes
IL3163600	McHenry Hospital	P	1-8-21	No	Not Active
IL3162842	NORTHWESTERN COMM HOSP OUTPT CARE CTR	A	1-12-21	No	Yes
IL3161992	CATERPILLER - PEORIA PROVING GROUNDS	A	1-15-21	No	Yes
IL3163626	PHARMACANN	A	1-15-21	No	Yes
IL3163667	Alexian Brothers Medical Ctr	A	10-27-22	No	Yes
IL3162297	MEADOW LANE SCHOOL	A	4-2-21	No	Yes
IL3163725	Northwestern Medicine Woodstock Hospital	A	4-5-21 – P 2-9-22 - A	No	Yes
IL3161828	NORTHERN WHITE SANDS LLC	A	4-15-21	No	Yes
IL3163824	MULLER-PINEHURST DAIRY	A	4-21-21	No	Yes
IL3163832	THE MOSQUITO AUTHORITY	I	4-21-21 – P 1-6-22 - I	No	Not Active
IL3163875	CORE FX INGREDIENTS	A	4-23-21	No	Yes
IL3163519	RAY TRAPP - OFFICES/WAREHOUSE	I	5-20-21	No	Not Active
IL3164020	OSF St. Francis Hospital	P	5-21-21	No	Not Active
IL3163253	HIGHLAND PARK HOSPITAL	A	5-28-21	No	Yes
IL3164129	Sygenta	p	7-22-21	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active

TABLE G

NCPWS State FY 2023 Violations Issued *

NOV Issued	Facility Name	Facility ID Number	NOV Number	NOV Description
8/18/2022	AMERICAN LEGION POST 489	IL3029694	NV2022016	Nitrate M/R
10/14/2022	BALMORAL ELEM	IL3082024	NV2022052	Failure to have Qualified Operator
8/4/2022	BLACK MARINE INC CAMPGROUND	IL3134635	NV2022008	Nitrate M/R, Coliform M/R and 2021 SSU
8/18/2022	BRISTOL TAP	IL3138859	NV2022021	Nitrate M/R
9/7/2022	CAMP MATHIEU	IL3017814	NV2022015	Nitrate M/R, Coliform M/R and 2021/2022
9/16/2022	CAMP ONE WAY	IL3097790	NV2022034	Nitrate M/R and Nitrite M/R
10/21/2022	COG HILL COUNTRY CLUB	IL3088518	NV2022051	Failure to have Qualified Operator, PBCU M
8/18/2022	CROSSROADS CHURCH	IL3151415	NV2022022	Nitrate M/R
9/16/2022	DEER CREEK CAMPGROUND	IL3149484	NV2022035	Nitrate M/R, Coliform M/R and 2021/2022
6/16/2023	DIAMOND SLOTS	IL3114652	NV2023001	Nitrate MCL, Nitrate M/R, and Nitrite M/R
9/21/2022	DUNHAM WOODS RIDING CLUB	IL3068510	NV2022038	Coliform M/R
8/4/2022	ERIE CAMPGROUND	IL3097931	NV2022003	Nitrate M/R
9/30/2022	EUREKA SPORTSMENS CLUB	IL3058628	NV2022037	2021/2022 SSU
10/17/2022	FOUR WILLOWS GOLF COURSE	IL3130997	NV2022028	Nitrate M/R (2018/2019)
8/4/2022	GAMBER COVE	IL3069104	NV2022004	Nitrate M/R

8/3/2022	GLENWOOD RV RESORT	IL3000711	NV2022001	Nitrate M/R and 2021 SSU
8/4/2022	GLENWOOD RV RESORT (120832)	IL3120832	NV2022006	Nitrate M/R and 2021 SSU
9/22/2022	GRASS LAKE MARINA	IL3120782	NV2022026	Coliform M/R and 2021/2022 SSU
9/30/2022	HI VU MOTEL	IL3096255	NV2022041	Nitrate M/R
9/30/2022	JIMBOS TAVERN	IL3103135	NV2022042	Nitrate M/R
10/25/2022	JUGANDO SE APRENDE	IL3162131	NV2022045	All Monitoring and Operator Violations add
9/1/2022	JW MARRIOT HOTEL	IL3156836	NV2022032	PBCU M/R, Failure to have Qualified Opera
8/4/2022	LAKE RAWSON	IL3021907	NV2022002	Nitrate M/R, Coliform M/R, and 2021 SSU
9/1/2022	LAKEWOOD HILLS BEACH	IL3122440	NV2022027	Nitrate M/R and 2021/2022 SSU
9/30/2022	LEDGES SWIM CLUB	IL3124891	NV2022043	Nitrate M/R, Coliform M/R and 2022 SSU
9/22/2022	MARY ANN BEEBE CTR/ACTIVITY CTR (18226)	IL3018226	NV2022039	2022 SSU
8/3/2022	MOONS LITTLE ACRES	IL3017517	NV2022005	Nitrate M/R
9/30/2022	MOSYS BAR AND GRILL	IL3161220	NV2022044	Nitrate M/R
10/14/2022	MOTHER TERESA CATHOLIC ACADEMY	IL3024281	NV2022046	Failure to have Qualified Operator
8/18/2022	P N A YOUTH CAMP ASSN	IL3033449	NV2022017	Coliform M/R and 2021/2022 SSU
9/16/2022	PONDEROSA WILDERNESS AREA	IL3010611	NV2022036	2021/2022 SSU
10/21/2022	SMOKIN'Z BBQ LLC	IL3164111	NV2022054	Failure to have Qualified Operator, Initial P
8/4/2022	STEITZS RESORT	IL3023242	NV2022010	Nitrate M/R and Coliform M/R
10/21/2022	TALEEM UL HAQ	IL3161752	NV2022048	Failure to have Qualified Operator, Lead Co M/R
10/21/2022	TPG PRESSURE, INC.	IL3046318	NV2022053	Failure to have Qualified Operator
10/21/2022	TPG PRESSURE, INC. - WEST WELL	IL3153924	NV2022049	Failure to have Qualified Operator, Follow-
8/3/2022	TRENTON SPORTSMAN CLUB	IL3002121	NV2022014	Nitrate M/R
10/6/2022	WEBBS VALLEY VIEW CAMPGROUND	IL3122275	NV2022007	Nitrate M/R
8/4/2022	WILDWOOD CAMPGROUND	IL3057646	NV2022012	Nitrate M/R

**If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table H*

TABLE H (State Fiscal Year 2023 Data from Master NOV List)

Violation Type	Amount
ARSENIC MONITORING, ROUTINE MAJOR	
CHLORINE MONITORING, ROUTINE MAJOR	
QUALIFIED OPERATOR FAILURE	9
E. COLI MONITORING, ROUTINE MAJOR	8
IOCS MONITORING, ROUTINE MAJOR	
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	5
INITIAL TAP SAMPLING (LCR)	1
LEAD CONSUMER NOTICE (LCR)	1
NITRATE MCL	1
NITRATE MONITORING, ROUTINE MAJOR	24
NITRITE MONITORING, ROUTINE MAJOR	2
PUBLIC NOTICE	3
STARTUP PROCEDURES TT (RTCR)	11
SOC MONITORING, ROUTINE MAJOR	3
TOTAL THM-HAA5 MONITORING, ROUTINE MAJOR	1

Violation Type	Amount
VOCS MONITORING, ROUTINE MAJOR	1

TMF PRE-SCREENING SURVEY

Public Water Supply Name: Click or tap here to enter text. Facility ID #: Click or tap here to enter text.

Date: Click or tap here to enter text. Prepared by: Click or tap here to enter text.

TECHNICAL CAPACITY

Record your system's total annual pumpage for the past year (gallons): Click or tap here to enter text.	
Record peak 7-day week of pumpage (gallons): Click or tap here to enter text. Dates: Click or tap here to enter text.	
List the amount of water billed or sold to customers for the past year (gallons): Click or tap here to enter text.	
Number of service connections: Click or tap here to enter text.	
Population served: Click or tap here to enter text.	
List plant capacity (GPD): Click or tap here to enter text.	
List total well capacity (GPD): Click or tap here to enter text.	
List total well capacity with largest well out of service (GPD): Click or tap here to enter text.	
Is standby/emergency power equipment exercised?	☐ YES ☐ NO ☐ N/A
If yes, specify the source of stand-by power and associated kW rating: Click or tap here to enter text.	
Is emergency power in place to operate both the source and plant to meet average day demand?	☐ YES ☐ NO ☐ N/A
Is emergency power in place to operate all booster stations necessary to maintain pressure?	☐ YES ☐ NO ☐ N/A
Frequency of exercise: ☐ Weekly ☐ Monthly ☐ Quarterly ☐ Annual ☐ Other - Click or tap here to enter text.	
Can your system provide uninterrupted water service for 24 hours without electrical power?	☐ YES ☐ NO ☐ N/A
Is there any water main less than 3 inches (if in rural area) or 4 inches (if in urban area)?	☐ YES ☐ NO ☐ N/A
Total length of water mains (miles): Click or tap here to enter text.	
Length of water main replaced in the past three years (miles): Click or tap here to enter text.	
Number of water main repairs in the past three years: Click or tap here to enter text.	
Are hydrants routinely flushed and maintained?	☐ YES ☐ NO ☐ N/A
Flush frequency: ☐ Annual ☐ Spring/Fall ☐ As Needed ☐ Other - Click or tap here to enter text.	
List the number of dead ends in the distribution without flushing devices: - Click or tap here to enter text.	
Does the system practice unidirectional flushing?	☐ YES ☐ NO ☐ N/A
Are the locations of all valves in the distribution system precisely known?	☐ YES ☐ NO ☐ N/A
Is there adequate valving to allow for isolation and facilitate unidirectional flushing?	☐ YES ☐ NO ☐ N/A
Are all valves periodically exercised and maintained?	☐ YES ☐ NO ☐ N/A
Is a maintenance log for valves maintained?	☐ YES ☐ NO ☐ N/A
List valve exercising frequency: Click or tap here to enter text.	
Are locations, size and type of mains and valves detailed on records or maps kept in a secure area?	☐ YES ☐ NO ☐ N/A
Are meter pits and curb stops located, unobstructed and accessible?	☐ YES ☐ NO ☐ N/A
Models of all test kits used for water quality monitoring: Click or tap here to enter text.	
List amount of water unaccounted for (%): Click or tap here to enter text.	
Are all customers, water sources and treatment plants metered?	☐ YES ☐ NO ☐ N/A
List the frequency of meter calibration: Click or tap here to enter text.	
What is the average age of meters in the distribution system? (years): Click or tap here to enter text.	
Is your treatment equipment adequate to provide drinking water that meets all drinking water standards?	☐ YES ☐ NO ☐ N/A
List the name of the satellites served: Click or tap here to enter text	
List the names of all emergency interconnections: Click or tap here to enter text.	
Under normal conditions, what is the range of distribution pressure? (psi): Click or tap here to enter text.	
Is the distribution pressure always above 20 psi during large usage events?	☐ YES ☐ NO ☐ N/A

MANAGERIAL CAPACITY

Is there a clear plan of organization and control among the system's managers and operators?	☐ YES ☐ NO ☐ N/A
Are there contingency plans in place for unanticipated loss of key personnel?	☐ YES ☐ NO ☐ N/A
Is a written emergency response plan in place and up to date?	☐ YES ☐ NO ☐ N/A
Is the emergency response plan reviewed at least every three years and revised, if necessary?	☐ YES ☐ NO ☐ N/A
Does the emergency response plan provide alternate sources of water during emergencies?	☐ YES ☐ NO ☐ N/A
What type of alternate water sources are provided? (bottled water, haulers, etc.) Click or tap here to enter text.	
Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology?	☐ YES ☐ NO ☐ N/A
Does the utility perform inspections of work performed on the system by outside contractors?	☐ YES ☐ NO ☐ N/A
Are construction permits obtained prior to starting water supply projects that require a permit?	☐ YES ☐ NO ☐ N/A
Are operating permits obtained before placing those improvements into service?	☐ YES ☐ NO ☐ N/A
Do you maintain copies of all water sample results, operating reports and inspection reports?	☐ YES ☐ NO ☐ N/A
Do you issue boil water orders when pressure drops below 20 psi or contamination is suspected?	☐ YES ☐ NO ☐ N/A
Do you notify the IEPA Regional Office when boil water orders are issued?	☐ YES ☐ NO ☐ N/A
Do you notify the local county health department when boil water orders are issued?	☐ YES ☐ NO ☐ N/A
How many boil water orders were issued in the last 12 months? Click or tap here to enter text.	
Describe the boil water order sampling procedures: Click or tap here to enter text.	
Do you have a cross-connection control program?	☐ YES ☐ NO ☐ N/A
Are the cross-connection surveys reviewed after they are returned?	☐ YES ☐ NO ☐ N/A
Is the cross-connection program enforced? (example: shutting off water if not in compliance)	☐ YES ☐ NO ☐ N/A
Do you maintain an inventory of all installed backflow assemblies?	☐ YES ☐ NO ☐ N/A
Do you maintain a tracking system to ensure backflow assemblies are tested at least annually?	☐ YES ☐ NO ☐ N/A
Do you maintain copies of the test results of all backflow assemblies?	☐ YES ☐ NO ☐ N/A
Are the backflow assemblies owned by the system tested at least annually with a tag indicating the testing date?	☐ YES ☐ NO ☐ N/A
Where are the cross-connection survey results and records kept? Click or tap here to enter text.	
When was the last cross connection survey done (required every 3 years)? Click or tap here to enter text.	
Please describe any climate resiliency measures implemented at your water system (e.g. drought measures, flood control, etc.): Click or tap here to enter text.	
Does your water system use operational technology?	☐ YES ☐ NO ☐ N/A
If yes, are there any cybersecurity measures in place (e.g. password minimum length, multi-factor authorization, etc.)?	☐ YES ☐ NO ☐ N/A
Please describe the cybersecurity measures, if any: Click or tap here to enter text.	

FINANCIAL CAPACITY

Does your organization have an annual budget for operating and maintaining the water system?	☐ YES ☐ NO ☐ N/A
Are the water rates regularly reviewed? ☐ YES ☐ NO ☐ N/A Date of the last increase: Click or tap here to enter text.	
Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years?	☐ YES ☐ NO ☐ N/A
Are adequate reserve funds in place to provide for emergency repairs?	☐ YES ☐ NO ☐ N/A
Can your organization cover the costs of an emergency or failure of its most vulnerable component?	☐ YES ☐ NO ☐ N/A
Does your organization have a 5-year Capital Improvement Plan for major water system improvements?	☐ YES ☐ NO ☐ N/A
Are your rates sufficient to meet the costs of the 5-year Capital Improvement Plan?	☐ YES ☐ NO ☐ N/A
Does your organization have procedures for selecting outside contractors and suppliers?	☐ YES ☐ NO ☐ N/A

ASSET MANAGEMENT

Does your water system have an asset management plan in place?	☐ YES ☐ NO ☐ N/A
If yes, when was the asset management plan last updated?: Click or tap here to enter text.	
Is the asset management plan actively utilized?: Click or tap here to enter text.	
Does the asset management plan define level of service goals?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include an inventory of the water system's current assets?	☐ YES ☐ NO ☐ N/A
Does the asset management plan rank the criticality of each asset?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include an operation and maintenance plan for the water system?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include a capital improvement plan?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include a long-term financial strategy?	☐ YES ☐ NO ☐ N/A

Illinois' Capacity Development Program

Annual Status Report

State Fiscal Year 2021

(July 1, 2020 – June 30, 2021)

Prepared by:

Illinois Environmental Protection Agency &

Illinois Department of Public Health

Contents

1.0 Introduction

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement which can be found in Title 35 of the Illinois Administrative Code (IAC) Part 652 and Title 77 of the IAC Part 900. Illinois also had to develop and implement a strategy to help all existing CWS and NTNCWS systems achieve and maintain TMF capacity beginning October 1, 2000. Illinois submitted a Capacity Development Strategy for existing public water supplies in July 2000 to the US Environmental Protection Agency (USEPA) and the strategy was approved by the USEPA on September 27, 2000. In Illinois, the Illinois Environmental Protection Agency (IEPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) regulates non-community water supplies (NCWS).

2.0 New Systems Program Annual Reporting Criteria

2.1 Legal Authority

2.1.1 CWS

Illinois' legal authority to implement the New Systems Program for CWS can be found in 35 IAC Part 652 Subpart C. No modifications have been made to this Subpart in State Fiscal Year (FY) 2021.

2.1.2 NTNCWS

Illinois' legal authority to implement the New Systems Program for NTNCWS can be found in 77 IAC Part 900 Section 900.45. No modifications have been made to this Subpart in State Fiscal Year (FY) 2021.

2.2 Modifications to Control Points

2.2.1 CWS

The IEPA relies on the existing construction and operating permit requirements as control points for evaluating the capacity of new CWS systems. The majority of new CWS systems in the last three years do not have a history of non-compliance with regulations and/or other TMF related issues and therefore control points were not modified in State FY 2021.

2.2.2 NTNCWS

The IDPH relies on the existing construction permit requirements as control points for evaluating the capacity of new NTNCWS systems. The majority of new NTNCWS systems in the last three years do not have a history of non-compliance with regulations and/or other TMF related issues and therefore control points were not modified in State FY 2021.

2.3 List of New Systems in Last 3 Years

2.3.1 CWS

For the past 3 State Fiscal Years, 29 CWS systems have become active or are in the process of becoming new systems. Table A lists these systems, their activity status, activity date and indicates if their ETT score is above 11. Two of these systems have ETT scores above 11 (7% of the total new system for last 3 State Fiscal Years). The IEPA believes that this low percentage is an indicator that the New Systems Program for CWS systems is effective.

2.3.2 NTNCWS

For the past 3 State Fiscal Years, 52 non-community water supplies (NCWS) systems have become active or are in the process of becoming new systems. Table E lists these systems, their activity status, activity date and if their ETT score exceeds 11. None of the NCWS systems exceed 11. The IDPH believes that this is an indicator that the New Systems Program for NCWS systems is effective.

3.0 Existing System Strategy

3.1 Existing Program Overview

3.1.1 CWS

The IEPA uses a combination of tools to assist existing CWS systems in acquiring and maintaining TMF capacity. These tools include engineering evaluations (sanitary surveys), enforcement actions, permit requirements for construction and operation, the Drinking Water State Revolving Fund (DWSRF), Source Water Protection Program, monitoring requirements, Operator Certification Program, cross-connection control, and technical assistance.

Engineering Evaluations

The IEPA conducts periodic inspections of all CWS systems to determine if their ongoing programs for monitoring, maintaining the water supply, and providing appropriate information to the water users meets the requirements of the Illinois Pollution Control Board's (Board) public water supply regulations and related standards. Inspections are conducted for each CWS system approximately every three years and inspected in chronological order. However, inspection priority is given to systems that utilize surface water as a source. Inspections may also be conducted to follow-up on significant deficiencies noted in the previous inspections as well as emergency situations. Across all regions of Illinois 522 inspections were conducted in the 2021 State fiscal year and so far, 482 Engineering Evaluation Reports have been completed for these inspections.

Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each public water supply. Field staff review the TMF survey prior to the site-visit and items of concern are reviewed and discussed on-site at the time of evaluation. Deficiencies noted in the previous engineering evaluation are followed-up on to determine if they have been remedied.

Once the engineering evaluation is complete, the field staff send a letter to the CWS system notifying them that an inspection has been completed and that any regulatory deficiencies and/or recommendations noted are provided as an attachment to the letter. CWS systems are then required to respond to deficiencies noted within 45 days. The response must detail the steps that have been or will be taken to correct these deficiencies. In State FY 2021 out of the 482 Engineering Evaluation Reports completed, 387 systems received follow-up letters with regulatory deficiencies and/or recommendations for improvement listed. 316 of these letters contained regulatory deficiencies that had to be responded to within 30 days. 283 responses were received and deemed to be adequate. While the IEPA does document the severity of the deficiencies in the Safe Drinking Water Information System (SDWIS), the actual deficiency and regulatory citation is not included in SDWIS. In the future, the IEPA plans to look into training staff further to utilize SDWIS. The IEPA does note that a significant amount of regulatory deficiencies related to the implementation of a Nitrification Action Plan, as required in recent revisions Title 35, Subtitle F of the Board regulations for CWS systems.

If an adequate response is not received within 45 days from the date of an inspection letter then the public water supply may be added to the Critical Review/Restricted Status List for any significant deficiencies that fall under one of the following categories: maximum contaminant level violations, treatment technique violations, source water quantity requirements, treatment unit loading rates, storage volume requirements, and distribution minimum pressure requirements. For further discussion on the Critical Review/Restricted Status list please see Section 3.2.1 below. Deficiencies that violate the SDWA will simultaneously be entered into the enforcement process, and any significant deficiencies that don't violate SDWA can also be followed-up with enforcement actions as requested.

Enforcement Actions

In Illinois, violations of the SDWA result in the system entering the enforcement process. The IEPA internal enforcement process escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) requires that CWS systems receive notification of any violations observed by representatives of the IEPA within 180 days of discovery of the violation.

Actions or deficiencies that constitute enforcement actions include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, permit violations, any operational issues that lead to immediate short-term health threats, and lack of a certified operator. Other deficiencies found during site-inspections or permit section investigations can also be trigged into the enforcement process if requested. All enforcement actions are tracked using the State's Master NOV Database. A list of violation notices and descriptions of the violations issued in State FY 2021 are shown in Table B of this report.

DWSRF

Illinois continues to work to capitalize the DWSRF for communities in need of financial capacity assistance. For State FY 2021 the IEPA issued approximately $158,974,429 in loans from the Public Water Supply Loan Program (PWSLP) of which $18,713,740 went to loan applicants who qualified for 35 IAC Part 662.110 as disadvantaged communities in the form of principal forgiveness and approximately $977,249 went to loan applicants who qualified for the "small system compliance assistance principal

forgiveness". The small system compliance assistance principal forgiveness was made available to CWS systems with a health-based maximum contaminant level violation. Eligible projects must result in the system with a history of health-based violations returning to compliance and must meet the following requirements: have an enforcement action initiated by the IEPA, a population with a median household income below the State average median household income, and must serve fewer than 1,500 customers. Pursuant to 35 IAC Part 662.130, public water supplies are ineligible for financial assistance under the PWSLP if they lack the technical, financial, and managerial capability to ensure compliance with the requirements of SDWA, unless the assistance will ensure compliance. Pursuant to 35 IAC Part 662.345, loan projects can be given additional priority points if the project includes the consolidation of two systems, removes applicants from the Restricted Status/Critical Review List, remedies health violations, or replaces lead service lines. Priority points are also given to applicants which are developing or implementing a source water protection plan or asset management plan.

The IEPA currently uses a portion of Set-Asides provided for in the 1996 Amendments to the SDWA from the Capitalization Grants when necessary to supplement existing state programs and funds, and not as substitutes for existing funds. This will allow the maximum amount of funds to be provided for infrastructure improvements. The State has asked for and used all of the 4% Administrative Set-Asides in the 2021 Capitalization Grant. Illinois also appropriated $100,000 a year via the Small Systems Technical Assistance Set-Aside, and $25,000 a year via the Local Assistance and Other State Programs Set-Aside for a contract with Illinois Rural Water Association (IRWA). The initial 2-year contract for State FY 2019 and FY 2020 with IRWA was for IRWA to provide technical assistance to public drinking water systems in Illinois with activities and issues including, but no limited to: technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, capacity development issues, etc. IEPA has renewed the contract for a second 2-year term with the same contractual terms and focus.

In the future, the IEPA plans to investigate the possible expansion of the amount appropriated for Set-Asides. The increased set-asides could be used to contract with third-party providers or conduct in-house technical assistance on planning efforts related to corrosion control studies and the regionalization of public water systems, well abandonment, asset management plans and implementation of these plans that address the USEPA's five-core questions, creating nitrification action plans, aquifer level monitoring and sustainability planning, and DWSRF loan application completion assistance.

Permit Requirements for Construction and Operation

Illinois has had a water supply permit program for many years, even prior to the creation of the IEPA in 1970, under the Board of Health. Currently the IEPA issues construction and operating permit for CWS systems. Pursuant to 35 IAC Part 602.200(a), a person must not cause or allow the construction of any new CWS installation, or cause or allow the change of or addition to any existing CWS, without a construction permit issued by the IEPA. 35 IAC Part 602.200(b) specifies that changes that require a permit include any alternations that may affect the sanitary quality, mineral quality or adequacy of CWS systems, adding new chemicals or points of application to the treatment process, and rehabilitating a water main using a liner. Any CWS project for which a construction permit is required is not allowed to be placed into operation without an operating permit approved by the IEPA pursuant to 35 IAC Part

602.300(a). All new public water supplies must demonstrate technical, financial and managerial capacity to ensure compliance with drinking water standards pursuant to 35 IAC Part 652.300.

Source Water Protection Program

The IEPA has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted for all public water supplies in Illinois, including approximately 1,800 community water supplies. In addition, more than 4,100 non-community water supplies have been assessed. Illinois SWAP activities are divided into the following areas: community surface water supplies, non-community surface water supplies, community groundwater supplies, Lake Michigan supplies, non-community groundwater supplies, and mixed ground and surface water community water supplies.

SWAPs will help communities make important decisions about how to protect their drinking water by working to ensure safe drinking water supplies, the health and economy of the community, as well as the preservation of natural resources. In addition, investments in drinking water treatment will be sustained for a longer period of time. In August of 2019, Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary or emergency supply of water to develop source water protection plans that must be approved by the IEPA.

Monitoring Requirements

In Illinois, CWS systems are notified of their sampling requirements through sample demand letters. Sample demand letters are sent prior to the start of a monitoring period. If a new monitoring schedule or a change to a current monitoring schedule is made, the CWS is sent a letter from the compliance officer notifying them of the changes. Monitoring schedules are available to operators through drinking water watch (DWW). DWW reflects the most recent monitoring requirements and should be used to confirm monitoring is completed during the correct period.

For lead and copper monitoring changes, the IEPA has a site plan change request form available on our website. CWS systems can request to add, permanently remove, activate, inactivate, and change site information for any of their sites using this form. The owner or operator of each CWS system must develop a material inventory and submit annually by April 15th each year to the IEPA. Responsible Operators in Charge are reminded each year by email notifying them of the upcoming due date to submit their inventory.

Operator Certification Program

The IEPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems in order to assure that the water is safe in quality, clean, adequate in quantity, and of satisfactory mineral characteristics for ordinary domestic consumption. The operators must also maintain proper operation of drinking water treatment systems. In State FY 2021 Illinois had 3771 fully certified CWS operators , including 289 CWS operators that expired in 2020. An operator certified as competent by the IEPA must be able to perform duties without endangering public health. In order to determine competency, the IEPA must evaluate whether applicants for certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification. To help ensure that certified drinking

water operators' knowledge stays current, certified operators are also required to meet continuing education requirements in order to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third of the required training may be comprised of technical or non-technical/professional courses such as safety or management.

Cross-Connection Control

Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. Industries or facilities installing or possessing backflow prevention devices must have those devices inspected and tested at the time of installation and at least annually thereafter to ensure continued proper operation. Verification of inspection must be submitted to community water supply officials, who must ensure that appropriate inspection and maintenance of all cross-connection control devices has been performed. The cross-connection control device inspector approval program is coordinated by the field operation staff as a basic element of the water supply program. Actual registration and instruction is primarily conducted by the Environmental Resources Training Center, Edwardsville. The TMF pre-screening survey also questions whether or not the system is currently implementing a cross-connection control program.

Technical Assistance

IEPA regional offices regularly provide technical assistance to CWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone received from CWS systems throughout the year. The IEPA also has a contract with IRWA, where IRWA provides technical assistance to public water systems. The IEPA field staff routinely advises CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with. IRWA provides technical assistance to public drinking water systems in Illinois with activities and issues including, but no limited to, technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development.

3.1.2 NTNCWS

The IDPH uses a combination of tools to assist existing NCWS systems in acquiring and maintaining TMF capacity. These tools include sanitary surveys, enforcement actions, permit requirements for construction, Source Water Protection Program, monitoring requirements, Operator Certification Program, and technical assistance.

This program is unique because these systems are not in the business of producing water for resale; therefore, the treatment and monitoring of the water system has not traditionally been a routine function of management. The water supply at these facilities is used for drinking, sanitation and, in some cases, manufacturing processes. Demonstrating capacity for these types of NCWS is, for the most part, a small part of the overall management, budget, and operating plan for a specific PWS. IDPH uses existing field survey and visit opportunities to identify NCWS which need or may benefit from capacity development assistance. However, IDPH approaches the water supply compliance issues from a somewhat unique perspective of a side benefit activity rather than a primary activity and must work within the framework of the entire operation to best assist the supply in developing capacity. Central Office staff coordinates the dissemination of information and education of NCWS personnel for all new

or amended regulations and requirements. When capacity assistance is needed on-site, Central Office staff coordinate with Regional Office or LHD staff to provide training or technical assistance.

Sanitary Surveys

Sanitary surveys are performed every 2 years at all active, non-licensed NCWS and on an annual basis at all active, licensed systems (i.e. campgrounds, youth camps, bathing beaches, swimming pools, migrant labor camps). The sanitary survey includes a review of the eight elements of a sanitary survey: water source, pumps, distribution, storage, treatment, monitoring and reporting of analytical results / data verification, management and operation, and operator compliance (non-transient systems). IDPH Regional Offices and Local Health Departments working for IDPH completed 1595 sanitary surveys in the 2021 State fiscal year.

An inspection letter must be sent to the owner after the sanitary survey has been completed if significant deficiencies are noted. All significant deficiencies are cited with a time for correction. Any recommendations are also listed.

The results of the sanitary survey are documented on a sanitary survey / site inspection form. This form is used during the sanitary survey to provide the central office with a "hard" or "electronic" copy documenting the survey has covered all the eight elements required under the federal regulations. An evaluation summary for each of the eight elements is indicated for all sanitary surveys. The evaluation summary indicates the element was evaluated and if significant deficiencies were noted under that element. This information is reported in SDWIS/State. Significant deficiencies are also listed in a detailed description with required corrective action and a due date for completion. In addition, the sanitary survey / site inspection form indicates any changes that occurred since the last survey and provides a summary of Coliform and Nitrate samples since the last survey.

During the sanitary survey an update of inventory information is provided if this information has not been updated in SDWIS/State. This would include any new facility information (source, storage, treatment, etc.) as well as updates to administrative contacts and certified operator information.

Enforcement Actions

The IDPH internal enforcement process escalates to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action.

Actions or deficiencies that constitute enforcement actions include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, construction violations and lack of a certified operator. Reportable violations are tracked using a combination of SDWIS/State and an access database.

Permit Requirements for Construction

A permit to construct a new NCWS system must be obtained from the IDPH prior to construction. In addition, a permit for any major alteration of, or extension to, a NCWS must be obtained from IDPH prior to construction. Major alterations include changes to source, treatment, storage, or system capacity. Upon completion of any construction for which a permit has been issued, the owner is

required to notify IDPH. All applications for a permit to construct a NTNCWS must contain information relative to its financial, managerial, and technical capability to meet all drinking water regulations.

Source Water Protection Program

The IDPH has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted at more than 4,100 non-community water supplies and continue to be conducted. All new wells and surface water supplies are evaluated as to their vulnerability to potential contamination.

Monitoring Requirements

In Illinois, NCWS systems are notified of their sampling requirements through schedule letters and during the sanitary survey process. Sample schedule letters are sent for Nitrate monitoring requirements and for all non-transient chemical monitoring requirements. Coliform monitoring requirements are provided to NCWS systems during the sanitary survey. All monitoring schedules are available in drinking water watch and can be accessed at all times.

Operator Certification Program

The IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NCWS systems in order to ensure that drinking water systems are properly operated. In State FY 2021 Illinois had 383 fully certified NCWS operators, including 76 NCWS operators that expired in 2020. An operator certified as competent by the IDPH must be able to perform duties without endangering public health. In order to be certified by the Department, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified as a public water supply operator by the IEPA. Certified operators shall be recertified every three years. In order to be recertified, the operator shall attend a recertification training session approved by IDPH and provide proof of attendance from the organization conducting the course.

Technical Assistance

IDPH Regional Offices and Local Health Department offices, working for IDPH, regularly provide technical assistance to NCWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone received from NCWS systems throughout the year. IDPH central office also answers questions and gives assistance over the phone from NCWS systems on a routine basis. IDPH has also referred water systems to the Rural Community Assistance Program (RCAP) in the past for two water systems with difficult compliance issues. In addition, IDPH has referred systems with well problems to licensed well contractors for wells experiencing contamination issues. On particularly difficult well contamination problems, central office staff have accompanied inspectors in the field to explain regulations and offer solutions to NCWS owners and operators.

3.2 Identification of Systems in Need of Assistance

3.2.1 CWS

Illinois utilizes the various tools identified in Section 3.1.1 of this report to assist CWS systems in acquiring and maintaining TMF capacity. IEPA keeps track of deficiencies found using these tools with a combination of the Critical Review/Restricted Status List and the Master NOV Database. All enforcement actions are tracked using the Master NOV Database as mentioned previously. Any regulatory deficiencies found during site inspections or permit section investigations that either violates a maximum contaminant level, treatment technique, source water quantity, treatment unit loading rate, storage volume, or minimum pressure requirement are added to the IEPA's Critical Review/Restricted Status List. As defined in 35 IAC Part 602.106 restricted status is the IEPA's determination that a CWS facility, or portion thereof, may no longer be issued a construction permit without causing a violation of the Act or Board or IEPA rules. Critical Review is defined in 35 IAC Part 602.107 as the IEPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or IEPA's rules. Any CWS placed on the Critical Review/Restricted Status List is sent a notification letter. The IEPA publishes a copy of this list on its website and updates every three months. The Board publishes the list in the Environmental Register. A copy of the most updated Critical Review/Restricted Status List as of June 2021 can be found in Table C of this report.

Moving forward, the IEPA plans to review annually in August, the Master NOV Database and Critical Review/Restricted Status List to identify common trends in deficiencies found and compare to existing baseline data. The IEPA also plans explore options to better utilize SDWIS to track TMF deficiencies noted during site inspections that do not violate SDWA or meet the requirements to be placed on the Critical Review/Restricted Status List.

3.2.2 NTNCWS

Illinois utilizes the various tools identified in Section 3.1.2 of this report to assist NCWS systems in acquiring and maintaining TMF capacity. IDPH keeps track of violations cited and reported using SDWIS/State and developing spreadsheets with the various violation types listed. All enforcement actions are tracked using SDWIS/State and querying the data with an interactive Access database. IDPH is looking into developing a priority system scoring system to target the critical systems with multiple violations.

3.3 Assistance Approach

3.3.1 CWS

The IEPA continues to rely on IRWA to provide technical assistance through their contract as discussed in Section 3.1.1 under DWSRF. IEPA routinely advises water systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to assist with. IRWA also held eight cost-free training programs attended by 115 water supply officials representing 59 different water systems from August 1, 2020 through May 12, 2021. The Covid-19 restricted programs focused on distributed water quality and included, but was not limited to: disinfectant control, corrosion control, emergency planning, and water supply design, operation, and maintenance regulations.

IRWA held a meeting in July 2021 with the IEPA, USEPA, and IDPH to discuss the 2021/2022 plan for training and technical assistance for system operations. The top three priority training areas were

identified to be: diagnose and troubleshoot system's operational and maintenance issues with emphasis on regulatory compliance, source water protection, nitrification action planning, and emergency response planning with emphasis on compliance with America's Water Infrastructure Act of 2018. In the future, IEPA proposes to have more input on training topics based on common trends and deficiencies found during the tools described in Section 3.1.1.

By far, the deficiency that had the largest trend for State FY 2021 as identified on either the Master NOV Database or Critical Review/Restricted Status List was for systems with only one well. For a list of all deficiencies added in State FY 2021 to the Critical Review/Restricted Status List and/or the Master NOV Database please see Table D. Table D will be considered Illinois' CWS baseline for the Capacity Development Program**.** After the permit section's investigation, 129 systems were identified to be in violation of 35 IAC Part 604.230(c) for only having one well and therefore were added to the Critical Review/Restricted Status List during State FY 2021. As noted in Section 3.1.1 above in the DWSRF section of this report, the IEPA is evaluating the use of set-aside funds to contract out or hire in-house staff to provide technical and financial planning assistance for system consolidation.

3.3.2 NTNCWS

IDPH will continue to provide technical assistance during sanitary surveys and through phone contact with NCWS systems cited for deficiencies or that have violated drinking water regulations. IDPH will also look for opportunities to refer NCWS systems with difficult compliance issues to RCAP or possibly IRWA for on-site assistance.

In the past, RCAP has provided on-site assistance to systems with Arsenic and Lead/Copper compliance issues. IDPH regulates some small campgrounds in the central part of the State that rely on shallow groundwater and are vulnerable to E. coli contamination. These are particularly difficult compliance issues due to the lack of viable source water options in these areas. IDPH will be looking for potential assistance with this compliance issue.

3.4 Implementation Review

3.4.1 CWS

The IEPA has conducted a review of the existing system implementation strategy and found numerous areas that may be improved upon. These areas include, but are not limited to: reviewing compliance reports and the restricted status/critical review list annually to compare with baseline data in order to discover common trends, providing training to field staff on how to utilize SDWIS to track TMF deficiencies noted during site-inspections, contracting out technical and financial planning assistance to third-party or hiring-additional in-house staff through state Set-Asides, providing more feedback to IRWA on topics for operator certification training, and updating the capacity development strategy to account for the amendment to America's Water Infrastructure Act in 2018.

3.4.2 NTNCWS

The IDPH has conducted a review of the implementation of the existing system strategy and found some areas that may be improved upon. These areas include but are not limited to: reviewing violation data and developing a priority system for systems that need addressed, looking for more opportunities to utilize RCAP or IRWA for on-site assistance, looking for viable options to provide financial planning

assistance for NCWS systems, and updating the capacity development strategy to account for the amendment to America's Water Infrastructure Act in 2018.

3.5 Modifications to Existing Strategy

3.5.1 CWS

Illinois did not make any modifications to the existing CWS strategy in State FY 2021 but is evaluating possible modifications for State FY2022 as described in Section 3.4.1 above.

3.5.2 NTNCW

Illinois did not make modifications to the existing NTNCWS strategy in FY 2021, however is looking into possible modifications for FY2022 as described in Section 3.4.2 above.

4.0 Tables

TABLE A

New CWS Systems From State FY 2019 Through State FY 2021

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Dates	ETT Score >11
IL1635060	Meadowbrook MH Community, LLC	Active	3/23/2021	Formerly exempt-existed prior to 1999-no SEP required	No
IL1790480	Harding Road Apartments	Pending	12/16/2020	6/18/2021	No
IL0890080	Recovery Centers of America	Active	11/24/2020	Formerly exempt-existed prior to 1999-no SEP required	No
IL0971700	Brookdale Senior Living - Vernon Hills	Active	11/18/2020	Formerly exempt-existed prior to 1999-no SEP required	No
IL0830020	IL Alluvial Regional Water Company	Pending	11/2/2020	New CWS, working with CWS to submit Cap Dep Report	No
IL1150160	Decatur MHP, LLC	Active	7/8/2020	Formerly exempt-existed prior to 1999-no SEP required	No
IL0690160	IL American - Rosiclare	Active	5/29/2020	Formerly exempt-existed prior to 1999-no SEP required	No
IL0050400	County View MHC	Active	2/18/2020	Formerly exempt-existed prior to 1999-no SEP required	No
IL0317760	The Admiral at the Lake	Pending	1/28/2020	1/3/2021	No
IL1670260	United Regional Water Coop	Pending	1/17/2020	11/6/2020	No
IL1635080	ILDU Lepere MHP, LLC	Active	12/3/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL1190400	East 30 MHP	Active	11/21/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL0970255	Highland Lake Water Company	Active	9/17/2019	IEPA became aware of new CWS in 2019 and is working with them on submission of Cap Dev Report	Yes

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Date	ETT Score > 11
IL0935300	Hide-A-Way Lakes	Active	7/19/2019	IEPA became aware of new CWS in 2019 and is working with them on submission of Cap Dev Report	Yes
IL1195350	Village Green Mobile Home Park	Active	7/17/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL2035050	Tuckaway Peoria LLC	Active	6/19/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL1975030	Aqua Illinois - University Park	Active	6/18/2019	Previously part of Aqua Kankakee but is now own-no SEP req	No
IL1990120	The Orchards MHC	Active	3/29/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL0775410	Wildwood Mobile Home Park	Active	3/18/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL1790520	ILMO Oak Lawn MHP LLC	Active	1/30/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL1055040	ILPO Redwood MHP LLC	Active	1/25/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL0195320	Shadow Wood MHP	Active	1/23/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL1675185	Woodland Acres MHP	Active	1/4/2019	Formerly exempt-existed prior to 1999-no SEP required	No
IL0311960	Morton Grove - Niles Water Commission	Active	1/3/2019	11/1/2017	No
IL0317830	North Park University	Pending	12/19/2018	Formerly exempt-existed prior to 1999-no SEP required	No
IL0195310	Woodland Acres MHC	Active	11/27/2018	Formerly exempt-existed prior to 1999-no SEP required	No
IL1090380	Kiljordan Meadows	Active	10/1/2018	Formerly exempt-existed prior to 1999-no SEP required	No
IL0990510	Belle Aire Mobile Home Park	Pending	9/26/2018	Formerly exempt-existed prior to 1999-no SEP required	No
IL1670070	Grand Valley Village MHP	Active	9/1/2018	Formerly exempt-existed prior to 1999-no SEP required	No

TABLE B

CWS State FY 2021 Violations Issued Excluding Coal Combustion Residual Fee Violations

VN Issued	Facility Name	Facility ID	VN Number	VN Description
4/28/2021	ARCADIA CARE	IL0755389	W-2021-00013	FAILURE TO SUBMIT CONSTRUCTION PERMIT FOR OCCT
10/13/2020	BEDFORD PARK	IL0310120	W-2020-00066	FAILURE TO OBTAIN OPERATING PERMITS
8/27/2020	CALHOUN COUNTY RWD	IL0130010	W-2020-00056	EXCEEDANCE OF THE STAGE 2 TTHM MCL
4/28/2021	CASEY	IL0230050	W-2021-00012	FAILURE TO SUBMIT CONST. PERMIT FOR BLENDED PHOSPHATE FEED SYS
12/23/2020	CAVE-IN-ROCK	IL0690050	W-2020-00088	FAILURE TO PROPERLY ABANDON WELL #1 AND #2
3/9/2021	CENTURY PINES APARTMENTS	IL0150020	W-2021-00001	LACK OF A CLASS C OPERATOR, SEVERAL MONITORING VIOLATIONS
10/8/2020	CHERRY	IL0110200	W-2020-00064	LACK OF A CLASS B OPERATOR
4/29/2021	CISCO	IL1470150	W-2021-00011	ARSENIC MCL 0.011 MG/L
5/13/2021	COAL CITY	IL0630200	W-2021-00014	COMBINED RADIUM AND GROSS ALPHA MCL
4/27/2021	COMPTON	IL1030150	W-2021-00010	EXCCEDANCE OF TTHM AND HAA5 MCL
5/21/2021	COUNTRY ACRES MHP (LA SALLE COUNTY)	IL0995365	W-2021-00016	COMBINED RADIUM & GROSS ALPHA MCLS
10/27/2020	CRISWELL COURT MHP	IL1975105	W-2020-00068	FAILURE TO SUBMIT COLIFORM & RESIDUAL SAMPLE RESULTS & FAILURE TO SUBMIT OPERATING REPORTS.
9/22/2020	CROPSEY COMMUNITY WATER	IL1135150	W-2020-00063	FOLLOW UP ROUTINE TAP LEAD/COPPER MONITORING/REPORTING VIOLATION
6/15/2021	DEWEY PWD	IL0195200	W-2021-00020	FAILURE TO INSTALL OCCT TREATMENT
8/21/2020	EAST 30 MHP	IL1190400	W-2020-00053	FAILURE TO DO INITIAL LEAD COPPER SAMPLING
7/23/2020	EASY BREEZE MANUFACTURED HOME PARK	IL0495400	W-2020-00033	FAILURE TO MONITOR MONTHLY COLIFORM AND CHLORINE RESIDUAL
9/10/2020	EASY BREEZE MANUFACTURED HOME PARK	IL0495400	W-2020-00061	FOS VIOLATIONS
6/22/2021	ERIE	IL1950200	W-2021-00022	FAILURE TO SUBMIT OCCT/SOWT RECOMMENDATIONS
2/11/2021	FOX RIVER GROVE	IL1110200	W-2021-00003	WQPR EXCURSIONS
8/31/2020	GALENA TERRITORY-OAKWOOD	IL1830600	W-2020-00060	FAILURE TO MEET TURBIDITY REQUIREMENTS

VN Issued	Facility Name	Facility ID	VN Number	VN Description
12/18/2020	GIBSON CITY	IL0530100	W-2020-00071	FAILURE TO RESPOND TO ENGINEERING EVALUATION – FOS VIOLATIONS
3/4/2021	Green Meadow Estates of Rockford LLC (formerly GEM)	IL2015495	W-2021-00005	EXCEEDING COMBINED RADIUM MCL AT TP01
5/17/2021	HARMON	IL1030300	W-2021-00015	COMBINED RADIUM MCL, MATERIAL INVENTORY
3/4/2021	HIDE-A-WAY LAKES	IL0935300	W-2021-00004	EXCEEDING COMBINED RADIUM MCL AT TP01
7/16/2020	HIGHLAND LAKE WATER COMPANY	IL0970255	W-2020-00031	NEW SYSTEM MISSING EVERYTHING NO OPERATOR, NO NORP, NO MORS, NO CCCP, NO MASTER METER, NO SITE PLANS
10/27/2020	HILLVIEW	IL0610200	W-2020-00070	NITRATE MCL
4/7/2021	IL AMERICAN-ROSICLARE	IL0690160	W-2021-00008	EXCEEDING 1 NTU AT THE COMBINED FILTER EFFLUENT
8/7/2020	ILCV CANDLE MHP, LLC	IL1610120	W-2020-00052	EXCEEDENCE OF THE CHLORINE MRDL
9/1/2020	ILPO REDWOOD MHP LLC	IL1055040	W-2020-00058	FAILURE TO SUBMIT INITIAL LEAD COPPER DISTRIBUTION SAMPLES
3/26/2021	LAKESHORE ESTATES MHP	IL1190120	W-2021-00007	LACK OF A CLASS D OPERATOR
12/4/2020	MENDOTA	IL0990550	W-2020-00072	EXCEEDANCE OF STAGE 2 HAA5 MCL
8/10/2020	MILLSTONE PWD	IL1515050	W-2020-00051	FAILURE TO NOTIFY THE AGENCY OF WATER OUTAGE
6/24/2021	MOUNT ERIE	IL1910350	W-2021-00019	MULTIPLE FOS VIOLATIONS – WATER TREATMENT PLANT IN DISREPAIR; NO CROSS CONNECTION SURVEY; NO EOP
6/29/2021	MOUNT ZION	IL1150350	W-2021-00023	FAILURE TO INSTALL APPROVED CORROSION CONTROL TREATMENT
5/27/2021	MULBERRY GROVE	IL0050100	W-2021-00017	EXCEEDANCE OF STAGE 2 TTHM MCL
3/2/2021	NEOGA	IL0350150	W-2021-00006	MONTHLY COMBINED FILTER EFFLUENT TT (95%)
7/28/2020	NORTH TAZEWELL PWD	IL1795780	W-2020-00049	HAA5 MCL EXCEEDANCE
10/27/2020	NORTH TAZEWELL PWD	IL1795780	W-2020-00069	TTHM MCL EXCEEDANCE
9/11/2020	PENFIELD PWD	IL0195100	W-2020-00057	FAILURE TO INSTALL APPROVED OCCT
5/27/2021	PIERRON	IL1194760	W-2021-00018	EXCEEDANCE OF STAGE 2 HAA5 MCL
12/23/2020	SPARTA	IL1570600	W-2020-00089	EXCEEDANCE OF THE HAA5 MCL
10/27/2020	STERLING ESTATES MHP	IL0315850	W-2020-00067	FAILURE TO SUBMIT COLIFORM & RESIDUAL SAMPLE RESULTS & FAILURE TO ISSUE BOIL ORDERS.
8/27/2020	TABLE GROVE	IL0570900	W-2020-00055	EXCEEDANCE OF STAGE 2 TTHM MCL
7/23/2020	TIMBERLINE MHP	IL2035225	W-2020-00047	FAILURE TO MONITOR FOR MONTHLY COLIFORM AND CHLORINE RESIDUAL
8/21/2020	TIMBERLINE MHP	IL2035225	W-2020-00054	INSUFFICIENT CHLORINE RESIDUAL

VN Issued	Facility Name	Facility ID	VN Number	VN Description
8/7/2020	TOLONO	IL0191000	W-2020-00050	EXCEEDANCE OF THE TTHM MCL
7/23/2020	TRIANGLE MHP	IL0195925	W-2020-00048	FAILURE TO PROVIDE CONTINUOUS CHLORINATION
2/18/2021	WAGGONER	IL1350700	W-2021-00002	LACK OF A CLASS B OPERATOR, SEVERAL MONITORING VIOLATIONS
10/8/2020	WESTFIELD	IL0230200	W-2020-00065	LACK OF A CLASS C CERTIFIED OPERATOR
9/21/2020	WINSLOW	IL1770550	W-2020-00062	FAILURE TO INSTALL APPROVED CORROSION CONTROL TREATMENT

TABLE C

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AIR VIEW MHP	IL1615185	CR	1	NO BACKUP SOURCE	164	8/7/2020
ANCHOR	IL1130050	CR	4	ONLY ONE WELL	155	8/28/2020
ANDOVER	IL0730100	RS	1	NO BACKUP SOURCE	644	3/24/2016
AQUA ILLINOIS - CRYSTAL CLEAR WATER CO.	IL1115150	RS	2	NO EMERGENCY POWER & NO PRESSURE TANK	855	9/16/1988
AQUA ILLINOIS - HIGHLAND ESTATES	IL0915220	CR	2	ONLY ONE WELL	171	1/13/2021
AQUA ILLINOIS - INDIANOLA	IL1830500	CR	4	ONLY ONE WELL	224	12/11/2020
AQUA ILLINOIS - NUNDA	IL1115600	RS	2	INADEQUATE PRESSURE TANK	570	4/1/2015
AQUA ILLINOIS - SKYLINE	IL0915450	CR	2	ONLY ONE WELL	208	1/8/2021
AQUA ILLINOIS - SUN RIVER TERRACE	IL0910720	CR	2	ONLY ONE WELL	495	1/13/2021
ARCADIA CARE*	IL0755389	RS	4	NO CORROSION CONTROL TREATMENT	55	5/21/2021
AVANTARA LONG GROVE	IL0971110	RS	2	INADEQUATE PRESSURE TANK	200	12/1/2003
BAHL WATER CORP	IL0855200	RS	1	NO ELEVATED OR GROUND STORAGE	700	12/15/1993
BARBERRY ACRES MHP	IL0915145	RS	2	NO CHLORINE FEED SYSTEM; INADEQUATE PRESSURE TANK	61	10/31/2018
BEAVER CREEK VILLAGE MHP	IL0755125	CR	4	ONLY ONE WELL	48	1/6/2021
BEVERLY HILLSDALE ESTATES, LLC	IL1615530	RS	1	INADEQUATE PRESSURE TANK	63	3/18/1983
BEVERLY HILLSDALE ESTATES, LLC	IL1615530	CR	1	ONLY ONE WELL	63	8/14/2020
BILL-MAR HEIGHTS MHP	IL2015345	RS	1	INADEQUATE PRESSURE TANK	160	3/18/1983
BISHOP HILL	IL0730250	RS	1	NO BACKUP SOURCE	137	11/14/2017
BONNIE	IL0810150	RS	7	INADEQUATE ELEVATED STORAGE CAPACITY	527	7/20/2018
BROADVIEW ESTATES EAST PEORIA	IL1795365	RS	5	INADEQUATE PRESSURE TANK	300	3/18/1983
BROWNING	IL1690050	CR	5	ONLY ONE WELL	175	12/2/2020
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	RS	5	INADEQUATE PRESSURE TANK	45	6/16/2008
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	CR	5	ONLY ONE WELL	45	7/22/2020

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BUSY BEE MHP #1	IL1975195	CR	2	ONLY ONE WELL	25	12/4/2020
CALHOUN COUNTY RURAL WATER DISTRICT	IL0130010	RS	6	TOTAL TRIHALOMETHANES MCL VIOLATION	4515	9/4/2020
CAMP GROVE	IL1235100	CR	1	ONLY ONE WELL	75	6/24/2020
CANTON	IL0570250	CR	5	INADEQUATE TREATMENT CAPACITY	13932	3/15/2007
CAPRON MHP	IL0075105	RS	1	INADEQUATE PRESSURE TANK	98	3/18/1983
CAPRON MHP	IL0075105	CR	1	ONLY ONE WELL	98	1/27/2021
CARBON CLIFF	IL1610100	RS	1	RADIUM MCL VIOLATION	2000	1/28/2020
CARBON HILL	IL0630100	CR	2	INADEQUATE TREATMENT CAPACITY	392	12/14/2016
CARROLL HEIGHTS UTILITIES COMPANY	IL0155200	CR	1	ONLY ONE WELL	80	1/27/2021
CASEY*	IL0230050	RS	4	NO CORROSION CONTROL TREATMENT	3700	5/21/2021
CEDAR BROOK ESTATES SUBDIVISION	IL1615170	CR	1	ONLY ONE WELL	200	8/7/2020
CEDAR POINT WATER COMPANY	IL0995040	CR	1	ONLY ONE WELL	300	8/26/2020
CEDAR WATER COMPANY, INC.	IL0955150	CR	5	ONLY ONE WELL	160	1/13/2021
CENTRAL MACOUPIN RURAL WATER DISTRICT	IL1170040	RS	5	MINIMUM CHLORINE RESIDUAL VIOLATION	1825	8/29/2018
CENTURY PINES APARTMENTS	IL0150020	RS	1	INADEQUATE PRESSURE TANK	25	12/14/1990
CENTURY PINES APARTMENTS	IL0150020	CR	1	ONLY ONE WELL	25	1/27/2021
CHAIN-O-LAKES MHP	IL0975165	RS	2	INADEQUATE PRESSURE TANK	81	12/15/1989
CHAIN-O-LAKES MHP	IL0975165	CR	2	ONLY ONE WELL	81	8/28/2020
CHERRYDALE SUBDIVISION	IL1615120	CR	1	ONLY ONE WELL	80	8/5/2020
CHESTERFIELD	IL1170200	RS	5	MINIMUM CHLORINE RESIDUAL VIOLATION	180	8/29/2018
CHIGAKWA PARK ESTATES	IL1615140	CR	1	ONLY ONE WELL	53	8/7/2020
CHRISMAN	IL0450100	RS	4	ARSENIC MCL VIOLATION & NITRITE MCL VIOLATION	1,200	1/31/2018

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CISCO*	IL1470150	RS	4	ARSENIC MCL VIOLATION	300	4/21/2021
CLARKS MHP	IL2015425	RS	1	INADEQUATE PRESSURE TANK	80	12/16/1991
CLARKS MHP	IL2015425	CR	1	ONLY ONE WELL	80	12/4/2020
COAL CITY*	IL0630200	RS	2	COMBINED RADIUM MCL VIOLATION	5587	5/21/2021
COAL CITY	IL0630200	CR	2	INADEQUATE TREATMENT CAPACITY	5587	12/14/2016
COLONIAL MEADOWS**	IL1135100	RS	6	MINIMUM CHLORINE RESIDUAL VIOLATION	190	9/19/2018
COLONIAL MEADOWS	IL1135100	CR	6	ONLY ONE WELL	190	9/26/2020
COMPTON*	IL1030150	RS	1	TOTAL TRIHALOMETHANE MCL VIOLATION & HALOACETIC ACID MCL VIOLATION	300	4/9/2021
COUNTRY ACRES MHP (LA SALLE COUNTY)*	IL0995365	RS	1	COMBINED RADIUM AND GROSS ALPHA MCL VIOLATIONS	192	5/26/2021
COUNTRY LANE MHP	IL1135385	CR	4	ONLY ONE WELL	35	6/24/2020
COUNTRY TYME ESTATES	IL0195865	CR	4	ONLY ONE WELL	120	1/27/2021
COUNTRY VIEW ESTATES MHP	IL0195625	CR	4	ONLY ONE WELL	97	1/27/2021
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	RS	1	MINIMUM CHLORINE RESIDUAL VIOLATION	120	12/12/2018
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	CR	1	ONLY ONE WELL	120	7/15/2020
COYNE CENTER COOP	IL1615150	RS	1	INADEQUATE PRESSURE TANK	150	12/15/1997
CRISWELL COURT MHP	IL1975105	RS	2	INADEQUATE PRESSURE TANK	136	12/15/1989
DANFORTH	IL0750350	RS	4	TOTAL TRIHALOMETHANE MCL VIOLATION	550	8/9/2019
DANVERS	IL1130450	RS	4	NO OPTIMAL CORROSION CONTROL TREATMENT	1183	9/4/2020
DAYSPRING BIBLE COLLEGE	IL0977189	RS	2	INADEQUATE PRESSURE TANK	60	6/15/1988
DE LAND	IL1470200	RS	4	ARSENIC MCL VIOLATION	450	5/8/2020
DE WITT	IL0390100	CR	4	ONLY ONE WELL	200	1/27/2021

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DES PLAINES MHP	IL0317775	RS	2	INADEQUATE SOURCE CAPACITY & INADEQUATE PRESSURE TANK	580	3/16/1984
DIXIE ESTATES SUBDIVISION	IL1975520	CR	2	ONLY ONE WELL	180	12/9/2020
DONOVAN	IL0750400	CR	4	ONLY ONE WELL	306	1/6/2021
DONNELLSON	IL0054360	RS	6	TOTAL TRIHALOMETHANES MCL VIOLATION AND HALOACETIC ACID MCL VIOLATION	210	7/25/2019
DONNY BROOK ESTATES	IL0375150	CR	1	ONLY ONE WELL	30	1/27/2021
EAST END WATER ASSOCIATION	IL1610140	RS	1	INADEQUATE PRESSURE TANK	40	3/15/2002
EAST END WATER ASSOCIATION	IL1610140	CR	1	ONLY ONE WELL	40	7/31/2020
EAST LAWN WATER ASSOCIATION	IL1615100	CR	1	ONLY ONE WELL	160	8/5/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	CR	4	ONLY ONE WELL	112	12/11/2020
EAST MORELAND WATER ASSOCIATION	IL1975600	RS	2	NO ELEVATED OR GROUND STORAGE	1055	9/9/2016
EAST SIDE MHP	IL0195825	CR	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	CR	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	RS	5	INADEQUATE GROUND STORAGE & NO EMERGENCY POWER	125	1/1/2015
EDELSTEIN WATER COOPERATIVE	IL1435150	CR	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	RS	4	INADEQUATE PRESSURE TANK	112	12/17/1982
EHLERS MHP	IL0195645	CR	4	ONLY ONE WELL	112	1/27/2021
ELIZABETH (upper elevation area)	IL0850150	RS	1	LOW SYSTEM PRESSURE	675	6/15/1999
ELM OAK MUTUAL WATER SYSTEM	IL0975736	RS	2	RADIUM MCL VIOLATION	50	10/24/2019
ELM OAK MUTUAL WATER SYSTEM	IL0975736	CR	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	CR	5	ONLY ONE WELL	28	7/29/2020
EVERGREEN VILLAGE SUBDIVISION	IL1615310	CR	1	ONLY ONE WELL	130	8/12/2020

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EXETER - MERRITT WATER COOP	IL1710010	RS	5	INADEQUATE STORAGE CAPACITY	765	10/1/2013
FALCON FARMS	IL1617635	RS	1	NO ELEVATED OR GROUND STORAGE	475	10/31/2019
FAMILY MANUFACTURED HOME COMMUNITY, LLC	IL2015125	RS	1	INADEQUATE PRESSURE TANK	240	12/17/1982
FOUR STAR CAMPGROUND	IL0990060	RS	1	INADEQUATE PRESSURE TANK	150	6/15/1999
FOUR STAR CAMPGROUND	IL0990060	CR	1	ONLY ONE WELL	150	8/26/2020
FOX CREEK FARMS WATER COMPANY	IL1435750	CR	5	ONLY ONE WELL	221	7/29/2020
FOX LAWN HOMEOWNERS WATER ASSOCIATION	IL0935150	CR	2	ONLY ONE WELL	167	1/13/2021
FRENTRESS LAKE	IL0850010	CR	1	ONLY ONE WELL	150	1/8/2021
GARDEN STREET IMPROVEMENT ASSOCIATION	IL1975376	CR	2	ONLY ONE WELL	54	12/9/2020
GREAT OAKS AND BEACON HILLS APARTMENTS	IL2015488	RS	1	NO ELEVATED OR GROUND STORAGE & A RADIUM MCL VIOLATION	1816	12/17/1982
GREEN ACRES MHP	IL1035165	CR	1	ONLY ONE WELL	200	8/26/2020
GREEN MEADOWS ESTATES OF ROCKFORD LLC**	IL2015495	RS	1	COMBINED RADIUM MCL VIOLATION; INADEQUATE GROUND STORAGE & INADEQUATE PRESSURE TANK	970	6/15/2012
GREENFIELD	IL0610150	RS	6	HALOACETIC ACIDS MCL VIOLATION	1200	10/2/2019
HARMON*	IL1030300	RS	1	COMBINED RADIUM MCL VIOLATION	149	5/21/2021
HARMON	IL1030300	CR	1	ONLY ONE WELL	149	8/26/2020
HARVEST ESTATES	IL0915165	RS	2	INADEQUATE PRESSURE TANK	54	4/18/2019
HAWTHORN ESTATES SUBDIVISION	IL0630030	RS	2	INADEQUATE PRESSURE TANK	49	4/7/2017
HAZELWOOD 4TH ADDITION	IL0735350	CR	1	ONLY ONE WELL	135	1/6/2021
HAZELWOOD WEST SUBDIVISION	IL0735250	CR	1	ONLY ONE WELL	70	1/6/2021
HEATHERFIELD SUBDIVISION	IL0635150	CR	2	ONLY ONE WELL	90	1/29/2021

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HICKORY HILLS 2ND ADDITION	IL0730080	CR	1	ONLY ONE WELL	93	8/12/2020
HIDE-A-WAY LAKES*	IL0935300	RS	2	COMBINED RADIUM MCL VIOLATION	50	3/10/2021
HIDE-A-WAY LAKES	IL0935300	CR	2	ONLY ONE WELL	50	1/13/2021
HIGHLAND LAKE WATER COMPANY	IL0970255	CR	2	ONLY ONE WELL	36	8/26/2020
HIGHLAND SUBDIVISON	IL0895530	RS	2	INADEQUATE PRESSURE TANK	40	9/16/1983
HIGHLAND SUBDIVISION	IL0895530	CR	2	ONLY ONE WELL	40	1/8/2021
HOLLANDS GROVE COURT SUBDIVISION	IL1795300	CR	5	ONLY ONE WELL	40	12/2/2020
HILLCREST	IL1410250	RS	1	INADEQUATE SOURCE CAPACITY	1400	2/13/2018
HILLCREST	IL1410250	CR	1	INADEQUATE STORAGE CAPACITY	1400	11/2/2017
HILLSDALE PROPERTIES	IL1615728	RS	1	INADEQUATE PRESSURE TANK	60	1/14/1982
HILLSDALE PROPERTIES	IL1615728	CR	1	ONLY ONE WELL	60	6/24/2020
HILLVIEW	IL0610200	RS	6	NITRATE MCL VIOLATION	150	11/6/2020
HOLLY HOCK HILL MHP	IL0975245	RS	2	INADEQUATE PRESSURE TANK	52	12/16/1983
HOLLY HOCK HILL MHP	IL0975245	CR	2	ONLY ONE WELL	52	8/28/2020
HONEYCUTT HILL MHP LLC	IL1955225	RS	1	INADEQUATE PRESSURE TANK	75	9/17/1982
HOPEWELL	IL1235150	CR	1	ONLY ONE WELL	420	7/1/2020
HYDE-A-WAY LAKES	IL0935300	RS	2	NO CHLORINE FEED SYSTEM	50	10/31/2019
IL AMERICAN - ANDALUSIA (upper elevation area)	IL1610050	RS	1	LOW SYSTEM PRESSURE	1050	10/1/2003
IL AMERICAN - LEONORE	IL0990400	CR	1	ONLY ONE WELL	111	8/26/2020
IL AMERICAN - MIDWEST PALOS	IL0317050	CR	2	ONLY ONE WELL	143	1/27/2021
IL AMERICAN - NETTLE CREEK	IL0630040	CR	2	ONLY ONE WELL	285	1/29/2021
IL AMERICAN - RIDGECREST	IL0635100	CR	2	ONLY ONE WELL	219	1/29/2021
IL PRAIRIE ESTATE SBDV WATER ASSN	IL0995300	CR	1	ONLY ONE WELL	112	8/26/2020
INDIAN BLUFFS SUBDIVISION	IL1615520	CR	1	ONLY ONE WELL	150	8/14/2020

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INDIAN CREEK HOMEOWNERS AND WATER ASSN	IL1135250	CR	4	ONLY ONE WELL	240	6/17/2020
INGALLS PARK SUBDIVISION	IL1975880	RS	2	NO ELEVATED OR GROUND STORAGE	744	9/16/1983
IROQUOIS MOBILE ESTATES, INC.	IL0755185	CR	4	ONLY ONE WELL	105	1/8/2021
JOHNSBURG 1	IL1110040	CR	2	ONLY ONE WELL	174	8/28/2020
KENNEY	IL0390200	CR	4	ONLY ONE WELL	374	1/29/2021
KNOLLS EDGE SUBDIVISION	IL1415250	CR	1	ONLY ONE WELL	100	7/17/2020
LAFAYETTE	IL1750100	CR	1	ONLY ONE WELL	250	12/2/2020
LAKE LYNWOOD WATER SYSTEM	IL0735330	CR	1	ONLY ONE WELL	75	1/6/2021
LAKE SHANNON	IL0910020	CR	2	ONLY ONE WELL	500	1/13/2021
LAKE WILDWIND LLC	IL2035125	CR	1	ONLY ONE WELL	200	12/4/2020
LAND AND WATER ASSOCIATION	IL0995050	CR	1	ONLY ONE WELL	100	8/26/2020
LASALLE	IL0990300	CR	1	INADEQUATE SOURCE CAPACITY & INADEQUATE TREATMENT CAPACITY	9700	11/1/2004
LIBERTY PARK HOMEOWNERS ASSOCIATION	IL0435600	RS	2	INADEQUATE GROUND STORAGE CAPACITY	837	9/17/1992
LIMA	IL0010400	RS	5	INADEQUATE SOURCE CAPACITY & NITRATE MCL VIOLATION	163	5/4/2016
LINDENWOOD WATER ASSOCIATION	IL1415300	RS	1	INADEQUATE PRESSURE TANK	35	1/13/1982
LINDENWOOD WATER ASSOCIATION	IL1415300	CR	1	ONLY ONE WELL	35	7/22/2020
LINWAY ESTATES MHP	IL0315935	RS	2	NO ELEVATED OR GROUND STORAGE	450	2/28/2017
LISBON NORTH, INC.	IL0631000	RS	2	INADEQUATE PRESSURE TANK	25	9/14/1990
LISBON NORTH, INC.	IL0631000	CR	2	ONLY ONE WELL	25	1/29/2021
LYNN WATER ASSOCIATION	IL0735100	CR	1	ONLY ONE WELL	42	1/8/2021
LYNNWOOD WATER CORPORATION	IL0995336	RS	1	INADEQUATE PRESSURE TANK	110	3/18/1983
LYNNWOOD WATER CORPORATION	IL0995336	CR	1	ONLY ONE WELL	110	8/26/2020

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LYNWOOD 3RD ADDITION	IL0735280	CR	1	ONLY ONE WELL	100	1/6/2021
M C L W SYSTEM, INC.	IL1315150	CR	1	ONLY ONE WELL	98	7/10/2020
MACOMB	IL1090350	CR	5	INADEQUATE CLARIFIER CAPACITY	11309	12/14/2016
MALTA	IL0370350	RS	1	NO AUTO-START GENERATOR & INADEQUATE HIGH SERVICE PUMP CAPACITY	1175	6/15/2012
MANCUSO VILLAGE PARK MHP	IL2015545	RS	1	INADEQUATE PRESSURE TANK	500	6/18/1982
MANTENO MHP	IL0915385	RS	2	INADEQUATE PRESSURE TANK	144	12/14/1990
MAQUON	IL0950350	CR	5	ONLY ONE WELL	284	1/13/2021
MARSEILLES SOUTH	IL0990110	CR	1	ONLY ONE WELL	100	8/26/2020
MASON CITY	IL1250350	CR	5	INADEQUATE STORAGE CAPACITY	2558	1/1/2006
MAYFAIR SUBDIVISION	IL1795750	CR	5	ONLY ONE WELL	90	12/11/2020
MC NABB	IL1550150	CR	1	ONLY ONE WELL	310	6/11/2020
MENDOTA	IL0990550	RS	1	HALOACETIC ACIDS MCL	7273	10/30/2020
MILL POINT MHP	IL2035165	CR	1	ONLY ONE WELL	160	12/4/2020
MOUND CITY	IL1530100	CR	7	ONLY ONE WELL	588	6/5/2020
MOUND PWD	IL1635050	CR	6	INADEQUATE PLANT CAPACITY	2200	6/17/1996
MOUNT ERIE*	IL1910350	RS	7	INADEQUATE SOURCE CAPACITY	119	5/21/2021
MOUNT MORRIS ESTATES MHP	IL1415185	CR	1	ONLY ONE WELL	395	7/15/2020
MOUNT VERNON ASSOCIATION INC.	IL0855100	CR	1	ONLY ONE WELL	490	1/8/2021
MULBERRY GROVE*	IL0050100	RS	6	TOTAL TRIHALOMETHANES MCL VIOLATION	725	5/26/2021
NEPONSET	IL0110700	RS	1	MINIMUM CHLORINE RESIDUAL VIOLATION	374	4/17/2019
NORTH HAZELWOOD SUBDIVISION	IL0735850	CR	1	ONLY ONE WELL	100	1/8/2021
NORTH HENDERSON	IL1310300	CR	1	ONLY ONE WELL	187	7/2/2020

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NORTH TAZEWELL PWD	IL1795780	RS	5	HALOACETIC ACIDS MCL AND TOTAL TRIHALOMETHANES MCL VIOLATIONS	8300	1/9/2020
OAK GROVE MHP - ROCK ISLAND COUNTY	IL1617785	CR	1	ONLY ONE WELL	100	12/2/2020
OAK LAWN MHP	IL0075275	CR	1	ONLY ONE WELL	460	1/27/2021
OAK RIDGE SD	IL2035300	RS	1	INADEQUATE PRESSURE TANK	240	3/20/1981
OAK VIEW ESTATES	IL0730120	CR	1	ONLY ONE WELL	95	1/29/2021
OAKWOOD WEST SUBDIVISION	IL0730070	CR	1	ONLY ONE WELL	45	1/29/2021
OPHIEM PWS	IL0735150	CR	1	ONLY ONE WELL	100	1/8/2021
OSCO MUTUAL WATER SUPPLY COMPANY, INC.	IL0735200	RS	1	INADEQUATE PUMP CAPACITY	115	12/15/1989
OTTAWA ESTATES MHP	IL0995225	RS	1	INADEQUATE PRESSURE TANK	115	3/18/1983
OTTAWA ESTATES MHP	IL0995225	CR	1	ONLY ONE WELL	115	8/26/2020
PARADISE MANOR MHP	IL1617665	RS	1	INADEQUATE PRESSURE TANK	193	2/19/1982
PARADISE MANOR MHP	IL1617665	CR	1	ONLY ONE WELL	200	11/20/2020
PARK MEADOWLAND WEST MHP	IL0075235	RS	1	INADEQUATE PRESSURE TANK	100	3/18/1982
PARK MEADOWLAND WEST MHP	IL0075235	CR	1	ONLY ONE WELL	100	1/27/2021
PAULS MHP	IL0975485	RS	2	INADEQUATE PRESSURE TANK	38	12/16/1983
PAULS MHP	IL0975485	CR	2	ONLY ONE WELL	38	8/28/2020
PENFIELD PUBLIC WATER DISTRICT	IL0195100	RS	4	NO OPTIMAL CORROSION CONTROL TREATMENT	150	9/4/2020
PHIL-AIRE ESTATES MHP	IL2015625	CR	1	ONLY ONE WELL	80	12/4/2020
PIERRON*	IL1194760	RS	6	HALOACETIC ACIDS MCL VIOLATION	1928	5/26/2021
POLO DR AND SADDLE RD SUBDIVISION	IL0437000	CR	1	ONLY ONE WELL	93	1/29/2021
PORT BARRINGTON SHORES SUBDIVISION	IL0971120	CR	2	ONLY ONE WELL	67	8/26/2020
PORTS SULLIVAN LAKE OWNERS ASSOCIATION	IL0971160	RS	2	INADEQUATE PRESSURE TANK	293	6/15/1999

Illinois Environmental Protection Agency
Division of Public Water Supplies
Restricted Status / Critical Review Combined List

June 2021

SYSTEM NAME	SYSTEM ID	RS/CR	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
POWERS WATER CO., INC	IL0895550	CR	2	ONLY ONE WELL	214	1/8/2021
PRAIRIE OAKS ESTATES HOMEOWNERS ASSOCIATION	IL0630060	CR	2	ONLY ONE WELL	107	1/29/2021
PRAIRIE ROAD PUMP ASSOCIATION	IL2015100	RS	1	INADEQUATE PRESSURE TANK	150	1/1/2006
PRAIRIE VIEW WATER ASSOCIATION	IL1795900	CR	5	ONLY ONE WELL	35	12/11/2020
QUINCY	IL0010650	CR	5	INADEQUATE CLARIFIER CAPACITY	45000	8/3/2016
RAINBOW LANE MHP	IL2015645	RS	1	INADEQUATE PRESSURE TANK	83	6/17/1983
RAINBOW LANE MHP	IL2015645	CR	1	ONLY ONE WELL	83	12/4/2020
RAINBOW RIDGE	IL1615580	CR	1	ONLY ONE WELL	46	8/14/2020
REDDICK	IL0914780	CR	2	ONLY ONE WELL	210	1/8/2021
RIDGEWOOD LEDGES WATER ASSOCIATION	IL1615670	CR	1	ONLY ONE WELL	430	6/24/2020
ROCKLAND MHP	IL0975585	RS	2	INADEQUATE PRESSURE TANK	165	12/16/1983
ROLLING GREEN ESTATES MHP	IL1415245	RS	1	INADEQUATE PRESSURE TANK	215	6/14/1985
ROLLING GREEN ESTATES MHP	IL1415245	CR	1	ONLY ONE WELL	215	7/17/2020
ROYAL OAKS MHP	IL1115145	RS	2	INADEQUATE PRESSURE TANK	114	6/17/1983
RUSTIC ACRES WATER ASSOCIATION	IL0735500	CR	1	ONLY ONE WELL	260	1/6/2021
SANTA FE ESTATES WATER ASSOCIATION	IL1435490	CR	5	ONLY ONE WELL	84	7/29/2020
SCALES MOUND	IL0850400	RS	1	LOW SYSTEM PRESSURE (at elev. above 990 ft. MSL)	401	9/15/1997
SEATON	IL1310350	CR	1	ONLY ONE WELL	200	7/2/2020
SENECA MOBILE HOMES LLC	IL0995425	RS	1	INADEQUATE PRESSURE TANK	73	9/17/1982
SENECA MOBILE HOMES LLC	IL0995425	CR	1	ONLY ONE WELL	73	8/26/2020
SHANGRI-LA MHP	IL1415285	RS	1	INADEQUATE PRESSURE TANK	444	9/16/1983
SHAWNITA TRC WATER ASSOCIATION	IL1977690	RS	2	INADEQUATE PRESSURE TANK	135	9/17/1992
SILVIS HEIGHTS WATER CORP	IL1615750	RS	1	NO EMERGENCY GENERATOR	1600	12/1/2003

Illinois Environmental Protection Agency
Division of Public Water Supplies
Restricted Status / Critical Review Combined List

June 2021

SYSTEM NAME	SYSTEM ID	RS/CR	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
SIX OAKS MHP	IL2015685	RS	1	INADEQUATE PRESSURE TANK	48	6/18/1982
SIX OAKS MHP	IL2015685	CR	1	ONLY ONE WELL	48	12/4/2020
SPARTA (World Shooting Recreational Complex area)	IL1570600	RS	6	HALOACETIC ACIDS MCL VIOLATION	4600	1/8/2021
SPIN LAKE HOMEOWNERS ASSOCIATION	IL1135140	CR	4	ONLY ONE WELL	200	6/16/2020
STELLE COMMUNITY ASSOCIATION	IL0535100	CR	4	ONLY ONE WELL	100	1/29/2021
STEPHENSON MOBILE ESTATES	IL1775235	RS	1	INADEQUATE PRESSURE TANK AND INADEQUATE CHLORINE RESIDUAL	223	6/17/1983
STORYBOOK HIGHLANDS	IL0935250	CR	2	ONLY ONE WELL	100	1/13/2021
STRATFORD WEST APARTMENTS	IL1095200	CR	5	ONLY ONE WELL	44	8/26/2020
STRAWN	IL1050700	CR	4	ONLY ONE WELL	133	8/26/2020
SUBURBAN APARTMENTS (DE KALB UNIV DVL)	IL0375148	RS	1	INADEQUATE PRESSURE TANK	1050	12/16/1992
SUBURBAN HEIGHTS SUBDIVISION	IL1615800	CR	1	ONLY ONE WELL	57	11/20/2020
SUNNY HILLS ESTATES SUBDIVISION	IL0735300	RS	1	INADEQUATE PRESSURE TANK	525	6/15/2000
SUNNYLAND SUBDIVISION	IL1977730	RS	2	INADEQUATE SOURCE CAPACITY & INADEQUATE PRESSURE TANK	300	6/12/2018
SWEDONA WATER ASSOCIATION	IL1315200	RS	1	INADEQUATE PRESSURE TANK	157	6/15/1990
SYLVAN LAKE 1ST SUBDIVISION	IL0977100	RS	2	INADEQUATE PRESSURE TANK	210	6/14/1991
TABLE GROVE	IL0570900	RS	5	TOTAL TRIHALOMETHANES MCL VIOLATION	416	9/4/2020
TENNANTS SHADY OAKS SUBDIVISION	IL1615540	CR	1	ONLY ONE WELL	44	8/14/2020
TIMBER BROOK ESTATES	IL0735450	CR	1	ONLY ONE WELL	120	1/6/2021
TIMBER RIDGE MOBILE ESTATES	IL1775255	RS	1	INADEQUATE PRESSURE TANK	150	6/17/1996
TIMBER RIDGE SUBDIVISION	IL0735470	CR	1	ONLY ONE WELL	120	1/6/2021
TISKILWA	IL0111050	CR	1	INADEQUATE STORAGE CAPACITY	830	9/20/2017

Illinois Environmental Protection Agency
Division of Public Water Supplies
Restricted Status / Critical Review Combined List

June 2021

SYSTEM NAME	SYSTEM ID	RS/CR	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
TOLONO	IL0191000	RS	4	TOTAL TRIHALOMETHANE MCL VIOLATION	2700	8/5/2020
TOWER RIDGE SUBDIVISION	IL1615780	CR	1	ONLY ONE WELL	70	11/20/2020
TOWNERS SUBDIVISION	IL0977250	RS	2	INADEQUATE PRESSURE TANK	204	1/14/1982
TRIANGLE MHP	IL0195925	RS	4	ARSENIC MCL VIOLATION & MINIMUM CHLORINE RESIDUAL VIOLATION	90	6/15/2012
UTL INC - CAMELOT	IL1975200	CR	2	ONLY ONE WELL	575	12/9/2020
UTL INC - CHERRY HILL WATER COMPANY	IL1975280	CR	2	ONLY ONE WELL	624	12/9/2020
UTL INC - LAKE HOLIDAY	IL0995200	RS	1	INADEQUATE TREATMENT CAPACITY	6479	4/1/2015
UTL INC - LAKE WILDWOOD UTILITIES CORP	IL1235200	RS	1	INADEQUATE GROUND STORAGE & HIGH SERVICE PUMP CAPACITY	950	10/22/2015
UTL INC - WALK-UP WOODS WATER COMPANY	IL1115800	RS	2	NO ELEVATED OR GROUND STORAGE	781	12/17/1982
VALLEY VIEW SUBDIVISION (WOODFORD COUNTY)	IL2030010	RS	1	INADEQUATE PRESSURE TANK	100	6/15/2012
VAN ORIN WATER COMPANY	IL0115000	CR	1	ONLY ONE WELL	100	1/27/2021
VERMONT	IL0570950	RS	5	TOTAL TRIHALOMETHANE MCL VIOLATION & HALOACETIC ACID MCL VIOLATION	660	5/27/2020
VICTORIA	IL0950550	CR	5	ONLY ONE WELL	316	1/13/2021
VIETZEN MHP	IL0437245	RS	2	INADEQUATE PRESSURE TANK & LACK OF A CHLORINE FEED SYSTEM	145	6/17/1983
WATER WERKS	IL1615130	CR	1	ONLY ONE WELL	90	8/5/2020
WATERMAN	IL0370600	CR	1	ONLY ONE WELL	1506	1/27/2021
WHITE HALL	IL0610400	CR	6	INADEQUATE STORAGE CAPACITY	2900	10/1/2012

Illinois Environmental Protection Agency
Division of Public Water Supplies
Restricted Status / Critical Review Combined List

June 2021

SYSTEM NAME	SYSTEM ID	RS/CR	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
WILLOWAY TERRACE MHP	IL0317595	RS	2	NO ELEVATED OR GROUND STORAGE & INADEQUATE SOURCE CAPACITY	900	6/15/1984
WINDCREST SUBDIVISION	IL0730040	CR	1	ONLY ONE WELL	40	1/29/2021
WINDING CREEK ESTATES	IL1615850	CR	1	ONLY ONE WELL	160	11/20/2020
WINSLOW	IL1770550	RS	1	NO OPTIMAL CORROSION CONTROL TREATMENT	350	9/4/2020
WINSLOW	IL1770550	CR	1	ONLY ONE WELL	350	12/2/2020
WITT	IL1350850	CR	5	INADEQUATE TREATMENT CAPACITY	991	3/17/2008
WOODLAND	IL0751000	CR	4	ONLY ONE WELL	319	1/6/2021
YATES CITY	IL0950700	CR	5	ONLY ONE WELL	750	1/13/2021
YOUNGS HILLCREST MHP	IL0190040	CR	4	ONLY ONE WELL	34	1/27/2021

TABLE D

CWS State FY 2021 Baseline Data

	Source Capacity Issue	MCL Violation	Coal Combustion Residual	Managerial Capacity Issue	Monitoring Violation	Lead and Copper Violation	Treatment Technique Violation
No. of Systems	131	23	19	15	10	12	7

Table E

New Non-Transient Non-Community Water Supplies

From State FY 2018 Through FY 2021

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11
IL3161158	600 WAUKEGAN ROAD	A	7-17-18	No
IL3161240	CCI MANUFACTURING	A	7-18-18	No
IL3161505	UNION PACIFIC RAILROAD	A	7-19-18	No
IL3161455	PRIMROSE SCHOOL	A	7-19-18	No
IL3161448	NORTHBROOK MONTESSORI SCHOOL	A	7-19-18	No
IL3161372	ILLINOIS MARINE TOWING SHIP YARD	A	7-19-18	No
IL3112367	BANYAN TREATMENT CENTER	A	12-28-18	No
IL3162412	Mercy Hospital	P	6-12-19	No
IL3161794	FAITH CHRISTIAN ELEMENTARY SCHOOL	A	6-20-19	No
3162628	Acreage Holdings	P	10-2-19	No
IL3162651	Swedish Covenant Hospital	P	11-7-19	No
IL3162669	Nussbaum Properties #2	P	11-8-19	No
IL3162727	HARRIS REBAR	A	12-20-19	No
IL3162735	DEVANSOY INC	A	12-23-19	No

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11
IL3162743	NUESTRO QUESO - EXTERIOR WELL	A	12-23-19	No
IL3162750	NUESTRO QUESO - INTERIOR WELL	A	12-23-19	No
IL3162867	Loves Travel Stop	P	1-7-20	No
IL3163121	Blessing Hospital	P	4-22-20	No
IL3163014	SPECTRUM PREFERRED MEATS	A	5-13-20	No
IL3163204	Tree House Foods	P	7-10-20	No
IL3163147	SERENITY HOSPICE & HOME	A	7-22-20	No
IL3163287	Illinois Marine Towing	P	10-9-20	No
IL3163311	Blunier Builders	P	10-30-20	No
IL3163360	ST PETER LUTHERAN CHURCH/SONSHINE CHRIST	A	11-6-20	No
IL3162883	WEDRON SILICA PIT BUILDING	A	11-10-20	No
IL3163188	US SILICA OTTAWA SOUTH PIT	A	11-25-20	No
IL3162354	CHICAGO AUTISM ACADEMY	A	11-25-20	No
IL3163527	Morris Hospital	P	12-3-20	No
IL3162461	AVOCATE CHRIST MEDICAL CENTER	A	12-8-20	No
IL3163162	SPANCRETE INDUSTRIES INC.	A	12-8-20	No
IL3162313	BRANDT INDUSTRIES USA LTD	A	12-28-20	No

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11
IL3162610	ALLOY SPECIALTIES (10500320)	A	12-29-20	No
IL3163097	LAUNCH ENRICHMENT L3C	A	12-31-20	No
IL3163600	McHenry Hospital	P	1-8-21	No
IL3162842	NORTHWESTERN COMM HOSP OUTPT CARE CTR	A	1-12-21	No
IL3161992	CATERPILLER - PEORIA PROVING GROUNDS	A	1-15-21	No
IL3163626	PHARMACANN	A	1-15-21	No
IL3163667	Alexian Brothers Medical Ctr	P	2-12-21	No
IL3162099	WILLOW CREEK COMMUNITY CHURCH	P	3-15-21	No
IL3163691	VIRGIL FARM NORTH	A	3-16-21	No
IL3162297	MEADOW LANE SCHOOL	A	4-2-21	No
IL3163725	Northwestern Medicine Woodstock Hospital	P	4-5-21	No
IL3161828	NORTHERN WHITE SANDS LLC	A	4-15-21	No
IL3163782	WOODSMOKE RANCH	A	4-16-21	No
IL3163824	MULLER-PINEHURST DAIRY	A	4-21-21	No
IL3163832	THE MOSQUITO AUTHORITY	P	4-21-21	No

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11
IL3163875	CORE FX INGREDIENTS	A	4-23-21	No
IL3163907	CHURCH ON THE ROCK	A	4-23-21	No
IL3163519	RAY TRAPP - OFFICES/WAREHOUSE	I	5-20-21	No
IL3164020	OSF St. Francis Hospital	P	5-21-21	No
IL3163253	HIGHLAND PARK HOSPITAL	A	5-28-21	No
IL3164111	SMOKIN'Z BBQ LLC	A	7-26-21	No

Illinois' PWS Capacity Development Program

Annual Status Report

State Fiscal Year 2022

(July 1, 2021 – June 30, 2022)

Prepared by:

Illinois Environmental Protection Agency &

Illinois Department of Public Health

Contents

1.0 Introduction

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement which can be found in Title 35 of the Illinois Administrative Code (IAC) Part 652 and Title 77 of the IAC Part 900. Illinois also had to develop and implement a strategy to help all existing CWS and Non-Community Water Supplies (NCWS) achieve and maintain TMF capacity beginning October 1, 2000. Illinois submitted a Capacity Development Strategy for existing public water supplies in July 2000 to the US Environmental Protection Agency (USEPA) and the strategy was approved by the USEPA on September 27, 2000. In Illinois, the Illinois Environmental Protection Agency (IEPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) NCWS systems.

2.0 New Systems Program Annual Reporting Criteria

2.1 Legal Authority

2.1.1 CWS

Illinois' legal authority to implement the New Systems Program for CWS can be found in 35 IAC Part 652 Subpart C. No modifications have been made to this Subpart in State Fiscal Year (FY) 2022.

2.1.2 NCWS

Illinois' legal authority to implement the New Systems Program for NCWS can be found in 77 IAC Part 900 Section 900.45. No modifications have been made to this Subpart in State FY 2022.

2.2 Modifications to Control Points

2.2.1 CWS

The IEPA relies on existing construction and operating permit requirements as control points for evaluating the capacity of new CWS systems. In the last three years new CWS systems do not have a history of non-compliance with regulations and/or other TMF related issues and therefore control points were not modified in State FY 2022.

2.2.2 NCWS

The IDPH relies on existing construction permit requirements as control points for evaluating the capacity of new NCWS systems. The majority of new NCWS systems in the last three years do not have a history of non-compliance with regulations and/or other TMF related issues. Table F of this report was modified to include certified operator compliance status for new systems as a control point.

2.3 List of New Systems in Last 3 Years

2.3.1 CWS

For the past 3 State Fiscal Years, 24 CWS have become active or are in the process of becoming new systems. Table A lists these systems, their activity status, activity date and indicates if their enforcement

targeting tool (ETT) score is above 11. None of these systems have ETT scores above 11 (0% of the total new system for last 3 State Fiscal Years). The IEPA believes that this percentage is an indicator that the New Systems Program for CWS systems is effective.

2.3.2 NCWS

For the past 3 State Fiscal Years, 50 NCWS systems have become active or are in the process of becoming new systems. Table F lists these systems, their activity status, activity date and if their ETT score exceeds 11. None of the NCWS systems exceed 11. The IDPH believes that this is an indicator that the New Systems Program for NCWS systems is effective. A few don't have a certified operator yet. IDPH is taking action under a new enforcement standard operating procedure (SOP) to address those.

3.0 Existing System Strategy

3.1 Existing Program Overview

3.1.1 CWS

The IEPA uses a combination of tools to assist existing CWS systems in acquiring and maintaining TMF capacity. These tools include engineering evaluations, enforcement actions, permit requirements for construction and operation, the Drinking Water State Revolving Fund (DWSRF), Source Water Protection Program, monitoring requirements, Operator Certification Program, cross-connection control, and technical assistance.

Engineering Evaluations

The IEPA conducts periodic inspections of all CWS systems to determine if their ongoing programs for monitoring, maintaining the water supply, and providing appropriate information to the water users meets the requirements of the Illinois Pollution Control Board's (Board) public water supply regulations and related standards. Inspections are conducted for each CWS system approximately every three years and inspected in chronological order. However, inspection priority is given to systems that utilize surface water as a source. Inspections may also be conducted to follow-up on significant deficiencies noted in the previous inspections as well as emergency situations. Across all regions of Illinois 517 inspections were conducted in the 2022 State FY.

Field staff visually observe the facility and review on-site documents to evaluate the TMF capacity of existing systems. Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each public water supply. Field staff review the TMF survey prior to the site-visit and items of concern are discussed on-site at the time of evaluation. Deficiencies noted in the previous engineering evaluation are followed-up on to determine if they have been remedied.

Once the engineering evaluation is complete, the field staff send a letter to the CWS system notifying them that the inspection was completed and any regulatory deficiencies and/or recommendations noted are provided as an attachment to the letter. CWS systems are then required to respond to deficiencies noted within 45 days. The response must detail the steps that have been or will be taken to correct these deficiencies.

If an adequate response is not received within 45 days from the date of an inspection letter the public water supply may be added to the Critical Review/Restricted Status List for any significant deficiencies

that fall under one of the following categories: maximum contaminant level violations, treatment technique violations, source water quantity requirements, treatment unit loading rates, storage volume requirements, and distribution minimum pressure requirements. For further discussion on the Critical Review/Restricted Status list please see Section 3.2.1 below. Deficiencies that violate the SDWA will simultaneously be entered into the enforcement process. Significant deficiencies that do not violate the SDWA can also be followed-up with enforcement actions as requested.

The IEPA has taken steps towards utilizing SDWIS to track inspection deficiencies. In the past year the IEPA modified the deficiency type codes listed in SDWIS to match current regulations and has developed inspection checklists that identify the relevant SDWIS type codes. These updates will assist field engineers in entering deficiencies found during site inspection into SDIWS. In the next year the IEPA plans to develop a training program to further assist field engineers in entering inspection deficiencies and custom compliance schedules in SDWIS. The IEPA will use the data in SDWIS to track the number and type of deficiencies found during engineering evaluation. The number and type of deficiencies found each year will be compared to baseline data to determine capacity trends.

Enforcement Actions

In Illinois, violations of the SDWA result in the system entering the enforcement process. The enforcement process allows the IEPA to identify and address violations that are a direct result of inadequate TMF capacity. By requiring systems to address the violations, the TMF capacity of existing systems are improved. The IEPA internal enforcement process escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) requires that CWS systems receive notification of any violations observed by representatives of the IEPA within 180 days of discovery of the violation.

Actions or deficiencies that constitute enforcement actions include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, permit violations, any operational issues that lead to immediate short-term health threats, and lack of a certified operator. Other deficiencies found during site-inspections or permit section investigations can also be trigged into the enforcement process if requested. All enforcement actions are tracked using the State's Master NOV Database. A list of violation notices and descriptions of the violations issued in State FY 2022 are shown in Table B of this report.

DWSRF

Illinois continues to work to capitalize the DWSRF for communities in need of financial capacity assistance. For State FY 2022 the IEPA issued approximately $164,553,636 in loans from the Public Water Supply Loan Program (PWSLP) of which approximately $13,843,276 went to loan applicants who qualified for 35 IAC Part 662.110 as disadvantaged communities in the form of principal forgiveness, approximately $27,494,181 went to loan applicants who qualified for lead service line replacement funding, and $0 went to loan applicants who qualified for the "small system compliance assistance principal forgiveness". The small system compliance assistance principal forgiveness was made available to CWS systems with a health-based maximum contaminant level violation. Eligible projects must result in the system with a history of health-based violations returning to compliance and must meet the following requirements: have an enforcement action initiated by the IEPA, a population with a median household income below the State average median household income, and must serve fewer than 1,500 customers.

Pursuant to 35 IAC Part 662.130, public water supplies are ineligible for financial assistance under the PWSLP if they lack the technical, financial, and managerial capability to ensure compliance with the requirements of SDWA, unless the assistance will ensure compliance. The DWSRF program is an essential tool for systems to have the financial means to achieve adequate technical capacity. Pursuant to 35 IAC Part 662.345, loan projects can be given additional priority points if the project includes the consolidation of two systems, removes applicants from the Restricted Status/Critical Review List, remedies health violations, or replaces lead service lines. Priority points are also given to applicants which are developing or implementing a source water protection plan or asset management plan.

The IEPA currently uses a portion of Set-Asides provided for in the 1996 Amendments to the SDWA from the Capitalization Grants when necessary to supplement existing state programs and funds, and not as a substitute for existing funds. This will allow the maximum amount of funds to be provided for infrastructure improvements. The State has asked for and used all of the 4% Administrative Set-Asides in the 2022 Capitalization Grant. Illinois also appropriated $100,000 a year via the Small Systems Technical Assistance Set-Aside, and $25,000 a year via the Local Assistance and Other State Programs Set-Aside for a contract with Illinois Rural Water Association (IRWA). The initial 2-year contract for State FY 2019 and FY 2020 with IRWA was for IRWA to provide technical assistance to public drinking water systems in Illinois with activities and issues including, but no limited to: technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development issues. IEPA renewed the contract for a second 2-year term with the same contractual terms and focus. The contract has been extended for an additional year through June 30, 2023.

In an effort to reduce the large number of systems identified as having a health based MCL violation, the IEPA will make $1,000,000 available in principal forgiveness for State FY 2023. Applicants will be scored and ranked for priority in accordance with 35 IAC 662.345. The Agency must have issued a Violation Notice to the CWS under Section 31 of the Illinois Environmental Protection Act or have initiated an enforcement action against the CWS under Section 43 of the Act. The loan applicant must also have a median household income below the State average and must serve fewer than 3,300 customers. No applicant can receive more than $500,000 in small systems compliance principal forgiveness.

In an effort to reduce the large number of systems identified as under critical review for only having one well, the IEPA will make $1,350,000 available in principal forgiveness for State FY 2023. Applicants will be scored and ranked for priority in accordance with 35 IAC 662.345. Loan applicants must consider at least three alternatives and include a justification of the most feasible alternative based upon financial considerations, operational requirements, operator qualifications, reliability and water quality pursuant to 35 IAC 602.225(d). No applicant can receive more than $675,000 in one well critical review principal forgiveness.

In an effort to reduce the number of systems with manganese State MCL violations, the IEPA will make $1,350,000 in principal forgiveness available in State FY 2023 to community water supplies with a State MCL violation for manganese in accordance with 35 IAC 611.300(b). Eligible projects must result in the system with a State MCL violation for manganese returning to compliance. Applicants will be scored and ranked for priority in accordance with 35 IAC 662.345. No applicant can receive more than $675,000 in manganese compliance assistance principal forgiveness.

Permit Requirements for Construction and Operation

Illinois has had a water supply permit program for many years, even prior to the creation of the IEPA in 1970, under the Board of Health. Currently the IEPA issues construction and operating permits for CWS systems. Pursuant to 35 IAC Part 602.200(a), a person must not cause or allow the construction of any new CWS installation, or cause or allow the change of or addition to any existing CWS, without a construction permit issued by the IEPA. 35 IAC Part 602.200(b) specifies that changes that require a permit include any alternations that may affect the sanitary quality, mineral quality or adequacy of CWS systems, adding new chemicals or points of application to the treatment process, and rehabilitating a water main using a liner. The permit program allows IEPA to ensure that adequate technical and managerial capacity is provided for new and improved community water systems. Any CWS project for which a construction permit is required is not allowed to be placed into operation without an operating permit approved by the IEPA pursuant to 35 IAC Part 602.300(a). All new public water supplies must demonstrate technical, financial and managerial capacity to ensure compliance with drinking water standards pursuant to 35 IAC Part 652.300.

Source Water Protection Program

The IEPA has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted for all public water supplies in Illinois, including approximately 1,800 community water supplies. In addition, more than 4,100 non-community water supplies have been assessed. Illinois SWAP activities are divided into the following areas: community surface water supplies, non-community surface water supplies, community groundwater supplies, Lake Michigan supplies, non-community groundwater supplies, and mixed ground and surface water community water supplies.

SWAPs will help communities make important decisions about how to protect their drinking water by working to ensure safe drinking water supplies, the health and economy of the community, as well as the preservation of natural resources. In addition, investments in drinking water treatment will be sustained for a longer period of time. In August of 2019, Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary or emergency supply of water to develop source water protection plans (SWPP) that must be approved by the IEPA.

For next year's reporting period IEPA will provide information on SWPP submittal for 28 CWS systems (with populations >50,000). Information on SWPP submittals for 299 CWS systems (with populations between 5,000-50,000), and 765 CWS systems (with populations <5,000) will be provided in the subsequent years as required. The SWPP will be reviewed to help improve the systems internal evaluation of their water sources and to help facilitate protection of each system's water resources.

Monitoring Requirements

By requiring CWS to have a monitoring schedule the IEPA can evaluate whether or not CWS systems have adequate TMF capacity to meeting drinking water standards. In Illinois, CWS systems are notified of their sampling requirements through sample demand letters. Sample demand letters are sent prior to the start of a monitoring period. If a new monitoring schedule or a change to a current monitoring schedule is made, the CWS is sent a letter from the compliance officer notifying them of the changes. Monitoring schedules are available to operators through drinking water watch (DWW). DWW reflects the most recent monitoring requirements and should be used to confirm monitoring is completed during the correct period.

For lead and copper monitoring changes, the IEPA has a site plan change request form available on our website. CWS systems can request to add, permanently remove, activate, inactivate, and change site information for any of their sites using this form. The owner or operator of each CWS system must develop a material inventory and submit annually by April 15th each year to the IEPA. Responsible Operators in Charge are reminded each year by email notifying them of the upcoming due date to submit their inventory.

Operator Certification Program

The IEPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems in order to assure that the water is safe for ordinary domestic consumption and that existing CWS systems are maintaining adequate technical and managerial capacity. The operators must also maintain proper operation of drinking water treatment systems. In State FY 2022 Illinois had 3378 fully certified CWS operators , including operators that expired in 2021. There were 172 new operators certified in State FY 2022. An operator certified as competent by the IEPA must be able to perform duties without endangering public health.

In order to determine competency, the IEPA must evaluate whether applicants for operator certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification.

To help ensure that certified drinking water operators' knowledge stays current, certified operators are also required to meet continuing education requirements in order to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third of the required training may be comprised of technical or non-technical/professional courses such as safety or management. In 2020 an increase in virtual and correspondence-type operator training courses became available due to the in-ability to meet in-person. The IEPA approves operator renewal training credit for virtual courses that meet the requirements in 35 IAC 681.820.

Cross-Connection Control

Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. Industries or facilities installing or possessing backflow prevention devices must have those devices inspected and tested at the time of installation and at least annually thereafter to ensure continued proper operation. Verification of inspection must be submitted to community water supply officials, who must ensure that appropriate inspection and maintenance of all cross-connection control devices has been performed. The cross-connection control device inspector approval program is coordinated by the field operation staff as a basic element of the water supply program. Registration and instruction is primarily conducted by the Environmental Resources Training Center, Edwardsville. The TMF pre-screening survey also verifies whether or not the system is currently implementing a cross-connection control program.

Technical Assistance

IEPA regional offices regularly provide technical assistance to CWS systems through conversations conducted during sanitary surveys as well as answering questions over received over the phone from CWS systems throughout the year. The IEPA also has a contract with IRWA, where IRWA provides

technical assistance to public water systems. The IEPA field staff routinely advises CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with.

3.1.2 NCWS

The IDPH uses a combination of tools to assist existing NCWS systems in acquiring and maintaining TMF capacity. These tools include sanitary surveys, enforcement actions, permit requirements for construction, Source Water Protection Program, monitoring requirements, Operator Certification Program, and technical assistance.

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

<u>Sanitary Surveys</u>

Sanitary surveys are performed every 2 years at all active, non-licensed NCWS and on an annual basis at all active, licensed systems (i.e. campgrounds, youth camps, bathing beaches, swimming pools, migrant labor camps). The sanitary survey includes a review of the eight elements of a sanitary survey: water source, pumps, distribution, storage, treatment, monitoring and reporting of analytical results/ data verification, management and operation, and operator compliance (non-transient systems). IDPH Regional Offices and Local Health Departments working for IDPH completed 1931 sanitary surveys in the 2022 State FY.

An inspection letter must be sent to the owner after the sanitary survey has been completed if significant deficiencies are noted. All significant deficiencies are cited with a time for correction. Any recommendations are also listed.

The results of the sanitary survey are documented on a sanitary survey/site inspection form. This form is used during the sanitary survey to provide the central office with a “hard” or “electronic” copy documenting the survey has covered all the eight elements required under the federal regulations. An evaluation summary for each of the eight elements is indicated for all sanitary surveys. The evaluation summary indicates the element was evaluated and if significant deficiencies were noted under that element. This information is reported in SDWIS/State. Significant deficiencies are also listed in detailed description with required corrective action and a due date for completion. In addition, the sanitary survey/site inspection form indicates any changes that occurred since the last survey and provides a summary of coliform and nitrate samples since the last survey.

During the sanitary survey an update of inventory information is provided if this information has not been updated in SDWIS/State. This would include any new facility information (source, storage, treatment, etc.) as well as updates to administrative contacts and certified operator information.

Enforcement Actions

The IDPH internal enforcement process escalates to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. IDPH developed new enforcement SOPs with implementation beginning in State FY 2023. This SOP sets up specific levels of enforcement based on violation type, number of violations and/or time in non-compliance status.

Actions or deficiencies that constitute violations subject to enforcement include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, construction violations and lack of a certified operator. Reportable violations are tracked using a combination of SDWIS/State and an access database.

Permit Requirements for Construction

A permit to construct a new non-community public water system must be obtained from the IDPH prior to construction. In addition, a permit for any major alteration of, or extension to, a non-community public water system must be obtained from IDPH prior to construction. Major alterations include changes to source, treatment, storage, distribution, or system capacity. Upon completion of any construction for which a permit has been issued, the owner is required to notify IDPH. All applications for a permit to construct a non-transient, non-community public water system must contain information relative to its financial, managerial, and technical capability to meet all drinking water regulations.

Source Water Protection Program

IDPH has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted at more than 4,100 non-community water supplies and continue to be conducted. All new wells and surface water supplies are evaluated as to their vulnerability to potential contamination.

Monitoring Requirements

In Illinois, NCWS systems are notified of their sampling requirements through schedule letters and during the sanitary survey process. Sample schedule letters are sent for coliform and nitrate monitoring requirements and for all non-transient chemical monitoring requirements. The notification by letter of coliform schedules was new in 2022 as this was previously provided during sanitary surveys only. All monitoring schedules are available in drinking water watch and can be accessed at all times.

Operator Certification Program

IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems in order to ensure that drinking water systems are properly operated. In State FY 2022 Illinois had 436 fully certified NTNCWS operators. An operator certified as competent by IDPH must be able to perform duties without endangering public health. In order to be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified by IEPA as a public water supply operators. Certified operators shall be re-certified every three years. In order to be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session. New operator certification course and re-certification course providers both have provided virtual courses during the pandemic and will continue to have this ability as needed.

Technical Assistance

IDPH Regional Offices and Local Health Department offices working for IDPH regularly provide technical assistance to NCWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone received from NCWS systems throughout the year. The IDPH central office also answers questions and gives assistance over the phone to NCWS systems on a routine basis. IDPH has also referred water systems to the Rural Community Assistance Program (RCAP) in the past for two water systems with difficult compliance issues. In addition, IDPH has referred systems with well problems to licensed well contractors for wells experiencing contamination issues. On particularly difficult well contamination problems, central office staff has accompanied inspectors in the field to explain regulations and offer solutions to NCWS owners and operators.

3.2 Identification of Systems in Need of Assistance

3.2.1 CWS

Illinois utilizes the various tools identified in Section 3.1.1 of this report to assist CWS systems in acquiring and maintaining TMF capacity. IEPA keeps track of deficiencies found using some of these tools with a combination of the Critical Review List and the Master NOV Database. All enforcement actions are tracked using the Master NOV Database as mentioned previously. Table B lists all violations in the Master NOV Database for State FY 2022. The IEPA will no longer include the Restricted Status List in this report due to these violations already being included in the Master NOV Database. The IEPA continues to review the Master NOV Database and Critical Review List annually to identify common trends in CWS statewide capacity concerns.

Critical Review is defined in 35 IAC Part 602.107 as the IEPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or IEPA's rules. Any CWS placed on the Critical Review/Restricted Status List is sent a notification letter. The IEPA publishes a copy of this list on its website and updates every three months. The Board publishes the list in the Environmental Register. A copy of the most updated Critical Review List as of September 2022 can be found in Table C of this report.

The IEPA is in the process of preparing to use SDWIS to track CWS inspection deficiencies as discussed in Section 3.1.1 of this report under Engineering Evaluations . In the future the IEPA will use the data in SDWIS to track capacity concerns and compare to baseline data to determine trends.

3.2.2 NCWS

IDPH utilizes the various tools identified in Section 3.1.2 of this report to assist NCWS systems in acquiring and maintaining TMF capacity. IDPH keeps track of violations cited and reported using SDWIS/State and developing spreadsheets with the various violation types listed. All violations and enforcement actions are tracked using SDWIS/State and querying the data with an interactive Access database. IDPH has also developed a new enforcement SOP which identifies systems in the highest priority of non-compliance.

3.3 Assistance Approach

3.3.1 CWS

The IEPA continues to rely on IRWA to provide technical assistance through their contract as discussed in Section 3.1.1 under DWSRF. IEPA routinely advises water systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to assist with. From August 1, 2021 through July 31, 2022 IRWA held 17 cost-free training programs attended by 402 water supply officials representing 232 different water systems. The formal training programs focused on distributed water quality and included, but were not limited to: disinfectant control, corrosion control, emergency planning, and water supply design/operation/maintenance regulations. IRWA continues to focus on performing rate studies as these studies are the most common request for assistance from public water supply operators. In addition to completing rate studies, IRWA has provided assistance related to proper record keeping, guidance related to maintenance activities, proper plant operation and water loss auditing related activity.

The IEPA sorted data from the Master NOV Database for State FY 2022 (Table B) and data from the September 2022 Critical Review List (Table C) and included the data in Table E. Table D is considered the baseline data for CWS for Illinois. By far, the highest number of deficiencies for State FY 2022 in Table E was for systems with only one well. The number of systems with only one well did not change in the last year. As discussed in Section 3.1.1 of this report, the IEPA plans to reduce the number of systems with one well by offering principal forgiveness to systems to obtain a second water source. The loan requires applicants to justify source alternatives. By requiring systems to provide the alternative justification the IEPA hopes to encourage systems to consider consolidation. Table E also identifies a large increase in CWS systems with a State MCL manganese violation. The IEPA plans to reduce the number of systems with a State MCL manganese violation by offering principal forgiveness to achieve compliance as discussed in Section 3.1.1 of this report.

3.3.2 NCWS

IDPH will continue to provide technical assistance during sanitary surveys and through phone contact with NCWS Systems. Phone contact is made frequently with systems cited for deficiencies, violations of drinking water rules and having difficulties meeting drinking water contaminant standards.

In the past, RCAP has provided on-site assistance at two systems with Arsenic and Lead/Copper compliance issues. IDPH will continue to look for opportunities to refer NCWS systems with these difficult compliance issues to RCAP or possibly IRWA for on-site assistance.

IDPH has also requested that IRWA make on-site technical assistance visits to six transient systems that use surface water as part of IRWA's 2023 program activities. IDPH awaits to hear back from IRWA on this request.

IDPH regulates some small campgrounds in the central part of the State that rely on shallow groundwater and are vulnerable to E. coli contamination. These are particularly difficult compliance issues due to the lack of viable source water options in these areas. IDPH will continue to look for potential assistance with this compliance issue as needed possibly from IRWA also.

The American Camp Association - Illinois requested IDPH to participate in a member virtual meeting on February 24, 2022 to provide an overview of regulatory requirements for campgrounds and youth

camps classified as NCWS. An overview was provided during the call of monitoring requirements, drinking water contaminant standards, monitoring requirements and seasonal start-up procedures. This meeting was productive and provided a venue for future outreach to regulated water systems at campgrounds and youth camps.

IDPH is also coordinating across programs to encourage compliance with drinking water regulations. In 2022, campgrounds and youth camps were not issued operating license renewals if they operated a NCWS in non-compliance status. This has been helpful in returning many systems to compliance for violations of the drinking water regulations.

3.4 Implementation Review

3.4.1 CWS

The IEPA has conducted a review of the existing system implementation strategy and found numerous areas that may be improved upon. These areas include, but are not limited to: providing training to field staff on how to utilize SDWIS to track deficiencies noted during site-inspections and adding additional principal forgiveness programs to the existing DWSRF program. The capacity development strategy will be updated by December 31, 2022 to include how the State plans to promote and help implement public water supplies in creating asset management plans as required by the amendment to America's Water Infrastructure Act in 2018.

3.4.2 NCWS

The IDPH has conducted a review of implementation of the existing system strategy and found some areas that may be improved upon. These areas include but are not limited to: continuing to look for more opportunities to utilize RCAP or IRWA for on-site assistance, continuing to look for viable options to provide financial planning assistance for NCWS systems, continuing to incorporate stakeholder involvement, continued IDPH cross program coordination and updating the capacity development strategy to account for the amendment to America's Water Infrastructure Act in 2018. In 2023, a full evaluation will be made to modify the existing strategy in these areas. In addition, a Table G will be added with baseline (metrics) data pulling from SDWIS\State Violation data to evaluate statewide issues in the 2023 report.

3.5 Modifications to Existing Strategy

3.5.1 CWS

Illinois did make modifications to the existing CWS strategy in State FY 2022. The baseline data was updated to remove the restricted status deficiencies as well as to make deficiency type categories more specific. The strategy was updated to reflect changes made to the DWSRF program and the steps the IEPA is taking to be able to track inspection deficiencies in SDWIS.

3.5.2 NCWS

Illinois did develop a new enforcement SOP and updated coliform schedule notification by letter. Also, as a control point for new systems, certified operator compliance was added to Table F. These updates were modified in this strategy for State FY 2022. Finally, there are some preliminary and possible initiatives described in Section 3.4.2 above that IDPH will continue to evaluate for modification in State FY 2023.

4.0 Tables

TABLE A

New CWS Systems From State FY 2020 Through State FY 2022

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Dates	ETT* Score >11
IL1815500	Choate MHC	Active	6/21/2022	existed prior to 1999	No
IL1795030	UAW Senior Citizens Center	Pending	6/7/2022	existed prior to 1999	No
IL1115125	Oakbrook Estates MHP	Active	5/11/2022	existed prior to 1999	No
IL0978970	LCPW – Oak Terrace	Active	5/4/2022	existed prior to 1999	No
IL1670225	CC Forrest Park Property LLC	Pending	4/25/2022	existed prior to 1999	No
IL1670200	CC Cottonwood Cove Property LLC	Pending	4/25/2022	existed prior to 1999	No
IL0075185	Four Seasons MHP	Active	4/6/2022	existed prior to 1999	No
IL1631150	Valley View Estates	Active	2/18/2022	existed prior to 1999	No
IL1590220	Acorn Acres MHP	Active	11/9/2021	existed prior to 1999	No
IL1635000	Cahokia Heights	Active	8/6/2021	No new infrastructure built	No
IL0810200	Oak Grove Village	Active	7/12/2021	existed prior to 1999	No
IL1635060	Meadowbrook MH Community, LLC	Active	3/23/2021	existed prior to 1999	No
IL1790480	Harding Road Apartments	Pending	12/16/2020	6/18/2021	No
IL0890080	Recovery Centers of America	Active	11/24/2020	existed prior to 1999	No
IL0971700	Brookdale Senior Living – Vernon Hills	Active	11/18/2020	existed prior to 1999	No
IL0830020	IL Alluvial Regional Water Company	Pending	11/2/2020	New CWS, working with CWS to submit Cap Dep Report	No
IL1150160	Decatur MHP, LLC	Active	7/8/2020	existed prior to 1999	No
IL0690160	IL American – Rosiclare	Active	5/29/2020	existed prior to 1999	No
IL0317760	The Admiral at the Lake	Pending	1/28/2020	1/3/2021	No
IL1670260	United Regional Water Coop	Pending	1/17/2020	11/6/2020	No
IL1635080	ILDU Lepere MHP, LLC	Active	12/3/2019	existed prior to 1999	No

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Date	ETT Score > 11
IL1190400	East 30 MHP	Active	11/21/2019	existed prior to 1999	No
IL0970255	Highland Lake Water Company	Active	9/17/2019	Intends to separate the water supply and will no longer be a new CWS	No
IL1195350	Village Green Mobile Home Park	Active	7/17/2019	existed prior to 1999	No

* Note: ETT scores were only available through 3/31/2022

TABLE B

CWS State FY 2022 Violations Issued *

VN Issued	Facility Name	Facility ID Number	VN Number	VN Description
12/16/2021	ACORN ACRES MHP	IL1590220	W-2021-00054	FAILURE TO SUBMIT NORP AND FAILURE TO VERIFY IF CUSTOMERS ARE METERED
5/18/2022	ACORN ACRES MHP	IL1590220	W-2022-00029	NO COLIFORM OR CHLORINE MONITORING NO CCC PROGRAM, NO EOP, NO NAP
12/23/2021	ALBION	IL0470050	W-2021-00075	EXCEEDANCE OF MANGANESE STTE ONLY MCL AT TP03
1/27/2022	ARCOLA	IL0410050	W-2022-00006	FAILURE TO SUBMIT OCCT STUDY
4/20/2022	ARLINGTON PARK RACE TRACK	IL0310220	W-2022-00021	FAILURE TO PROVIDE A SAFE SOURCE OF RAW WATER
2/10/2022	ATLANTA	IL1070050	W-2022-00009	EXCEEDING WATER QUALITY PARAMETERS, FAILURE TO MAINTAIN RESIDUAL IN DISTRIBUTION
6/23/2022	BEAVERVILLE	IL0750100	W-2022-00032	FAILURE TO SUBMIT AN OPERATOR CONTRACT
6/23/2022	BLUFF LAKE LODGES, INC.	IL0970240	W-2022-00033	FAILURE TO SUBMIT AN APPROVABLE CONTRACT
8/2/2021	BRUSSELS	IL0130100	W-2021-00031	FAILURE TO INSTALL THE APPROVED OCCT
4/13/2022	BUNKER HILL	IL1170100	W-2022-00022	NO CERTIFIED OPERATOR, FAILURE TO FOLLOW SEP
1/28/2022	CAHOKIA HEIGHTS	IL1630200	W-2022-00002	FOS VIOLATIONS NO CAPACITY DEVELOPMENT, NO CROSS CONNECTION CONTROL PROGRAM, NO MORS

VN Issued	Facility Name	Facility ID Number	VN Number	VN Description
9/2/2021	CAMDEN-LITTLETON WATER COMMISSION	IL1695100	W-2021-00036	TREATMENT TECHNIQUE, 23 WQPR EXCURSIONS
9/29/2021	CARLINVILLE	IL1170150	W-2021-00044	EXCEEDANCE OF THE MANGANESE MCL
4/1/2022	CARLOCK	IL1130250	W-2022-00019	FAILURE TO SUBMIT OPERATOR CONTRACT
12/21/2021	CENTURY PINES APARTMENTS	IL0150020	W-2021-00052	LACK OF OPERATOR
12/8/2021	CHERRY VALLEY	IL2010050	W-2021-00072	EXCEEDING MCL FOR COMBINED RADIUM
6/6/2022	CHRISMAN	IL0450100	W-2022-00031	FAILURE TO SUBMIT TWO CONSECTUIVE LEAD CONSUMER NOTICES AND MONITOR FOR LEAD AND COPPER
11/24/2021	CLOVER LEAF VILLAGE MHP	IL1610160	W-2021-00065	FAILURE TO MONITOR FOR LEAD AND COPPER
8/3/2021	COMPTON	IL1030150	W-2021-00034	HAA5 MCL
8/19/2021	CORTLAND CORNERS MHP	IL0375125	W-2021-00035	LACK OF A CERTIFIED OPERATOR
3/17/2022	CORTLAND CORNERS MHP	IL0375125	W-2022-00011	FAILURE TO MONITOR RADS, NITRATE, LCR
12/9/2021	CRISWELL COURT MHP	IL1975105	W-2021-00071	FAILURE TO MONITOR FOR SOCS, VOCS, LEAD/COPPER, AND DBPS
10/20/2021	CROPSEY COMMUNITY WATER	IL1135150	W-2021-00053	LACK OF CLASS C CERTIFIED OPERATOR
12/30/2021	DANVERS	IL1130450	W-2021-00077	MANGANESE MCL EXCEEDANCE
8/2/2021	DONOVAN	IL0750400	W-2021-00025	FAILURE TO SUBMIT CCT VERIFICATION FORM AND FAILURE TO DISTRIBUTE PUBLIC ED MATERIALS
8/2/2021	FORSYTH	IL1150200	W-2021-00026	TT VIOLATION DUE TO 12 WQP EXCURSIONS
9/2/2021	FRANKLIN GROVE	IL1030250	W-2021-00038	LACK OF A CLASS C CERTIFIED OPERATOR
7/13/2021	GERMANTOWN	IL0270350	W-2021-00024	FAILURE TO MAINTAIN CHLORINE RESIDUAL
9/15/2021	Green Meadow Estates of Rockford LLC (formaly GEM)	IL2015495	W-2021-00042	EXCEEDING THE MCL FOR COMBINED RADIUM
8/2/2021	GRIDLEY	IL1130600	W-2021-00033	FAILURE TO SUBMIT OCCT RECOMMENDATIONS
1/27/2022	HARVEY	IL0311110	W-2022-00001	FAILURE TO SUBMIT OPERATOR CONTRACT
7/7/2021	HETTICK	IL1170500	W-2021-00021	TTHM MCL
7/23/2021	HOMETOWN	IL0311320	W-2021-00028	NOT MONITORING ANNUAL TESTING OF BACKFLOW DEVICES AND NOT COMPLETED CROSS-CONNECTION SURVEY.
11/30/2021	ILLIOPOLIS	IL1670550	W-2021-00058	EXCEEDANCE OF STAGE 2 TTHM MCL AT S2HH1 AND S2HT1
6/23/2022	JONESBORO	IL1810250	W-2022-00036	EXCEEDANCE OF LRAA MCL FOR TTHM

VN Issued	Facility Name	Facility ID Number	VN Number	VN Description
12/1/2021	JONS MHP	IL0990020	W-2021-00070	NITRATE MCL
2/9/2022	KINGSTON	IL0370250	W-2022-00007	FAILURE TO COMPLETE A CORROSION CONTROL STUDY, SUBMIT WQPR FORM & 4 2021 MORS
5/17/2022	LA SALLE	IL0990300	W-2022-00028	EXCEEDANCE OF LRAA MCL FOR TTHM
12/1/2021	LAKE SHANNON	IL0910020	W-2021-00068	EXCEENANCE OF STAGE 2 TTHM MCL AT SAMPLE POINT S2HT1 - 18530 W 3000 N RD.
9/14/2021	LAKESHORE ESTATES MHP	W1190120	W-2021-00041	FAILURE TO SUBMIT COLIFORM AND RESIDUAL SAMPLES, MORS, CCR, MATERIAL INVENTORY
2/15/2022	LAKESIDE PWD	IL0775150	W-2022-00008	MULTIPLE UNPERMITTED UNDERSIZED WATER LINES CROSS MULTIPLE PROPERTIES
9/29/2021	LEE	IL1034600	W-2021-00047	FAILURE TO ISSUE CCR
11/18/2021	LEWISTOWN	IL0570600	W-2021-00059	EXCEEDANCE OF THE MAGANESE MCL
10/27/2021	LOCKPORT TOWNSHIP WATER SYSTEM	IL1978100	W-2021-00055	FAILURE TO SUBMIT CORROSION CONTROL STUDY
1/24/2022	LYNWOOD	IL0311680	W-2022-00005	FAILURE TO ISSUE A 2021 CCR FOR CALENDAR YEAR 2020 AND FAILURE TO SUBMIT 2021 LCRN
8/2/2021	MAPLE ACRES MHP	IL0115135	W-2021-00027	ARSENIC MCL EXCEEDANCE
5/5/2022	MAPLETON	IL1430500	W-2022-00024	FAILURE TO SUBMIT OCCT AND SOWT RECOMMENDATIONS
3/17/2022	MARISSA	IL1630750	W-2022-00013	ROUTINE DBP MONITORING VIOLATIONS FOR TWO CONSECUTIVE QUARTERS.
6/15/2022	MARK	IL1550250	W-2022-00035	EXCEEDANCE OF LRAA MCL FOR TTHM
2/23/2022	MARKHAM	IL0311770	W-2022-00010	FAILURE TO SUBMIT A CONTRACT BETWEEN OPERATOR AND MARKHAM
6/30/2022	MAZON	IL0630500	W-2022-00037	EXCEEDANCE OF MANGANESE STATE ONLY MCL
2/24/2022	MEADOWS MENNONITE HOME	IL1135689	W-2022-00003	EXPIRED WATER OPERATOR CONTRACT
9/8/2021	MENARD RURAL WATER COOP	IL1290010	W-2021-00037	EXCEEDANCE OF TTHM MCL IN THE DISTRIBUTION SYSTEM SEVRVED BY ATHENS (DS2)
12/23/2021	MENARD RURAL WATER COOP	IL1290010	W-2021-00078	EXCEEDANCE OF THE TTHM MCL IN DS2 SERVED BY ATHENS
7/23/2021	MERIDIAN MHP	IL1415165	W-2021-00029	NOT TESTING FOR RESIDUAL CHLORINE, NO EMERGENCY ELECTRICAL POWER, NO MOP FOR 4/2021 OR 5/2021.
12/21/2021	MOUNT ZION	IL1150350	W-2021-00074	EXCEEDANCE OF TTHM MCL
11/19/2021	NEBO	IL1490500	W-2021-00063	FAILURE TO RE-ISSUE CCR AND SUBMIT CERTIFICATION FORM
12/2/2021	NEOGA	IL0350150	W-2021-00067	E. COLI MCL DURING AUGUST 2021 MONITORING PERIOD

VN Issued	Facility Name	Facility ID Number	VN Number	VN Description
9/29/2021	OLYMPIA FIELDS	IL0312280	W-2021-00045	FAILURE TO ISSUE CCR
11/18/2021	OLYMPIA FIELDS	IL0312280	W-2021-00062	FAILURE TO MONITOR FOR LEAD/COPPER 2 CONSECUTIVE MONITORING PERIODS
2/22/2022	OPHIEM PWS	IL0735150	W-2022-00012	FAILURE TO INSTALL THE APPROVED OCCT
11/19/2021	PALMYRA-MODESTO WATER COMMISSION	IL1175150	W-2021-00057	EXCEEDED THE MONTHLY COMBINED FILTER EFFLUENT 95%. FAILURE TO NOTIFY AGENCY
11/18/2021	PEORIA HEIGHTS	IL1434750	W-2021-00061	EXCEEDANCE OF MANGANESE MCL
5/12/2022	PHIL-AIRE ESTATES MHP	IL2015625	W-2022-00026	EXCEEDING THE MCL FOR COMBINED RADIUM
3/17/2022	PHOENIX	IL0312490	W-2022-00017	FAILURE TO SUBMIT ROUTINE DBP SAMPLES FOR TWO CONSECUTIVE QUARTERS
12/30/2021	PORT BYRON	IL1610550	W-2021-00079	MANGANESE MCL EXCEEDANCE
10/15/2021	POWERS WATER CO, INC.	IL0895550	W-2021-00046	FAILURE TO ISSUE CCR AND SUBMIT MATERIAL INVENTORY
3/7/2022	PRAIRIE PATH WATER COMPANY-GALENA	IL0855050	W-2022-00016	EXCEEDING THE MCL FOR COMBINED RADIUM
9/10/2021	PRAIRIE RIDGE ASSOCIATION	IL1115730	W-2021-00040	LACK OF AN APPROVABLE OPERATOR CONTRACT
10/19/2021	RIVERSIDE ESTATES MHP	IL1955165	W-2021-00051	LACK OF A CLASS D OPERATOR
3/28/2022	ROBBINS	IL0312700	W-2022-00020	FAILURE TO SUBMIT AN OPERATOR CONTRACT
5/18/2022	ROCKDALE	IL1970850	W-2022-00030	FAILURE TO MONITOR RADIOLOGICALS FOR TWO CONSECUTIVE QUARTERS AND FAILURE TO ISSUE PUBLICE NOTICE
10/14/2021	SHELDON	IL0750800	W-2021-00050	LACK OF APPROVABLE OPERATOR CONTRACT
12/16/2021	SHELDON	IL0750800	W-2021-00064	FAILURE TO MONITOR DBPS AND LEAD AND COPPER AND FAILURE TO ISSUE PUBLIC NOTICE
12/23/2021	SOUTH PEKIN	IL1790650	W-2021-00076	EXCEEDANCE OF THE MANGANESE STATE ONLY MCL AT TP01
9/27/2021	SPIN LAKE HOMEOWNERS ASSOCIATION, INC.	IL1135140	W-2021-00043	NITRITE MCL
11/24/2021	STONETOWN EDGEWOOD TERRACE, LLC	IL1795345	W-2021-00066	FAILURE TO MONITOR FOR PBCU AND FAILURE TO PROVIDE MINIMUM CHLORINE RESIDUAL IN DS
10/1/2021	STRATFORD WEST APARTMENTS	IL1095200	W-2021-00048	FAILURE TO PREPARE AND SUBMIT 2021 CCR
12/2/2021	STRATFORD WEST APARTMENTS	IL1095200	W-2021-00069	FAILURE TO HAVE AN OPERATOR AND FAILURE TO SUBMIT A NORP FORM

VN Issued	Facility Name	Facility ID Number	VN Number	VN Description
5/27/2022	TABLE GROVE	IL0570900	W-2022-00027	EXCEEDANCE OF STAGE 2 TTHM MCL
11/15/2021	TRENTON	IL0270500	W-2021-00056	EXCEEDANCE OF TTHM MCL.
6/24/2022	VILLAGE GREEN MHP	IL1195350	W-2022-00038	EXCEEDANCE OF LRAA MCL FOR TTHM
1/21/2022	WESTFIELD	IL0230200	W-2022-00004	FAILURE TO SUBMIT OCCT RECOMMENDATION
3/18/2022	WINDSOR	IL1730550	W-2022-00014	FAILURE TO COMPLETE A CORROSION CONTROL STUDY AND SEQUENTIAL SAMPLING

*If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table E

TABLE C

IEPA DPWS Critical Review List September 2022

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
AIR VIEW MHP	IL1615185	1	NO BACKUP SOURCE	164	8/7/2020
ANCHOR	IL1130050	4	ONLY ONE WELL	155	8/28/2020
AQUA ILLINOIS - HIGHLAND ESTATES	IL0915220	2	ONLY ONE WELL	171	1/13/2021
AQUA ILLINOIS - INDIANOLA	IL1830500	4	ONLY ONE WELL	224	12/11/2020
AQUA ILLINOIS - SKYLINE	IL0915450	2	ONLY ONE WELL	208	1/8/2021
AQUA ILLINOIS - SUN RIVER TERRACE	IL0910720	2	ONLY ONE WELL	495	1/13/2021
BEAVER CREEK VILLAGE MHP	IL0755125	4	ONLY ONE WELL	48	1/6/2021
BROWNING	IL1690050	5	ONLY ONE WELL	175	12/2/2020
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	5	ONLY ONE WELL	45	7/22/2020
BUSY BEE MHP #1	IL1975195	2	ONLY ONE WELL	25	12/4/2020
CAMP GROVE	IL1235100	1	ONLY ONE WELL	75	6/24/2020
CANTON	IL0570250	5	INADEQUATE TREATMENT CAPACITY	13932	3/15/2007
CAPRON MHP	IL0075105	1	ONLY ONE WELL	98	1/27/2021
CARBON HILL	IL0630100	2	INADEQUATE TREATMENT CAPACITY	392	12/14/2016
CARROLL HEIGHTS UTILITIES COMPANY	IL0155200	1	ONLY ONE WELL	80	1/27/2021
CEDAR BROOK ESTATES SUBDIVISION	IL1615170	1	ONLY ONE WELL	200	8/7/2020
CEDAR POINT WATER COMPANY	IL0995040	1	ONLY ONE WELL	300	8/26/2020
CEDAR WATER COMPANY, INC.	IL0955150	5	ONLY ONE WELL	160	1/13/2021
CENTURY PINES APARTMENTS	IL0150020	1	ONLY ONE WELL	25	1/27/2021
CHAIN-O-LAKES MHP	IL0975165	2	ONLY ONE WELL	81	8/28/2020
CHERRYDALE SUBDIVISION	IL1615120	1	ONLY ONE WELL	80	8/5/2020
CHIGAKWA PARK ESTATES	IL1615140	1	ONLY ONE WELL	53	8/7/2020
CLARKS MHP	IL2015425	1	ONLY ONE WELL	80	12/4/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
COAL CITY	IL0630200	2	INADEQUATE TREATMENT CAPACITY	5587	12/14/2016
COLONIAL MEADOWS	IL1135100	6	ONLY ONE WELL	190	9/26/2020
COUNTRY LANE MHP	IL1135385	4	ONLY ONE WELL	35	6/24/2020
COUNTRY TYME ESTATES	IL0195865	4	ONLY ONE WELL	120	1/27/2021
COUNTRY VIEW ESTATES MHP	IL0195625	4	ONLY ONE WELL	97	1/27/2021
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	1	ONLY ONE WELL	120	7/15/2020
DE WITT	IL0390100	4	ONLY ONE WELL	200	1/27/2021
DIXIE ESTATES SUBDIVISION	IL1975520	2	ONLY ONE WELL	180	12/9/2020
DONNY BROOK ESTATES	IL0375150	1	ONLY ONE WELL	30	1/27/2021
DONOVAN	IL0750400	4	ONLY ONE WELL	306	1/6/2021
EAST END WATER ASSOCIATION	IL1610140	1	ONLY ONE WELL	40	7/31/2020
EAST LAWN WATER ASSOCIATION	IL1615100	1	ONLY ONE WELL	160	8/5/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020
EVERGREEN VILLAGE SUBDIVISION	IL1615310	1	ONLY ONE WELL	130	8/12/2020
FOUR STAR CAMPGROUND	IL0990060	1	ONLY ONE WELL	150	8/26/2020
FOX CREEK FARMS WATER COMPANY	IL1435750	5	ONLY ONE WELL	221	7/29/2020
FOX LAWN HOMEOWNERS WATER ASSOCIATION	IL0935150	2	ONLY ONE WELL	167	1/13/2021
FRENTRESS LAKE	IL0850010	1	ONLY ONE WELL	150	1/8/2021
GARDEN STREET IMPROVEMENT ASSOCIATION	IL1975376	2	ONLY ONE WELL	54	12/9/2020
GREEN ACRES MHP	IL1035165	1	ONLY ONE WELL	200	8/26/2020
HARMON	IL1030300	1	ONLY ONE WELL	149	8/26/2020
HAZELWOOD 4TH ADDITION	IL0735350	1	ONLY ONE WELL	135	1/6/2021
HAZELWOOD WEST SUBDIVISION	IL0735250	1	ONLY ONE WELL	70	1/6/2021
HEATHERFIELD SUBDIVISION	IL0635150	2	ONLY ONE WELL	90	1/29/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
HICKORY HILLS 2ND ADDITION	IL0730080	1	ONLY ONE WELL	93	8/12/2020
HIDE-A-WAY LAKES	IL0935300	2	ONLY ONE WELL	50	1/13/2021
HIGHLAND LAKE WATER COMPANY	IL0970255	2	ONLY ONE WELL	36	8/26/2020
HIGHLAND SUBDIVISION	IL0895530	2	ONLY ONE WELL	40	1/8/2021
HILLCREST	IL1410250	1	INADEQUATE STORAGE CAPACITY	1400	11/2/2017
HILLSDALE PROPERTIES	IL1615728	1	ONLY ONE WELL	60	6/24/2020
HILLSDALE ESTATES, LLC	IL1615530	1	ONLY ONE WELL	63	8/14/2020
HOLLANDS GROVE COURT SUBDIVISION	IL1795300	5	ONLY ONE WELL	40	12/2/2020
HOLLY HOCK HILL MHP	IL0975245	2	ONLY ONE WELL	52	8/28/2020
HOPEWELL	IL1235150	1	ONLY ONE WELL	420	7/1/2020
IL AMERICAN - LEONORE	IL0990400	1	ONLY ONE WELL	111	8/26/2020
IL AMERICAN - MIDWEST PALOS	IL0317050	2	ONLY ONE WELL	143	1/27/2021
IL AMERICAN - NETTLE CREEK	IL0630040	2	ONLY ONE WELL	285	1/29/2021
IL AMERICAN - RIDGECREST	IL0635100	2	ONLY ONE WELL	219	1/29/2021
IL PRAIRIE ESTATE SBDV WATER ASSN	IL0995300	1	ONLY ONE WELL	112	8/26/2020
INDIAN BLUFFS SUBDIVISION	IL1615520	1	ONLY ONE WELL	150	8/14/2020
INDIAN CREEK HOMEOWNERS AND WATER ASSN	IL1135250	4	ONLY ONE WELL	240	6/17/2020
IROQUOIS MOBILE ESTATES, INC.	IL0755185	4	ONLY ONE WELL	105	1/8/2021
JOHNSBURG 1	IL1110040	2	ONLY ONE WELL	174	8/28/2020
KENNEY	IL0390200	4	ONLY ONE WELL	374	1/29/2021
KNOLLS EDGE SUBDIVISION	IL1415250	1	ONLY ONE WELL	100	7/17/2020
LAFAYETTE	IL1750100	1	ONLY ONE WELL	250	12/2/2020
LAKE LYNWOOD WATER SYSTEM	IL0735330	1	ONLY ONE WELL	75	1/6/2021
LAKE SHANNON	IL0910020	2	ONLY ONE WELL	500	1/13/2021
LAKE WILDWIND LLC	IL2035125	1	ONLY ONE WELL	200	12/4/2020
LAND AND WATER ASSOCIATION	IL0995050	1	ONLY ONE WELL	100	8/26/2020
LASALLE	IL0990300	1	INADEQUATE SOURCE CAPACITY & INADEQUATE TREATMENT CAPACITY	9700	11/1/2004

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
LINDENWOOD WATER ASSOCIATION	IL1415300	1	ONLY ONE WELL	35	7/22/2020
LISBON NORTH, INC.	IL0631000	2	ONLY ONE WELL	25	1/29/2021
LYNN WATER ASSOCIATION	IL0735100	1	ONLY ONE WELL	42	1/8/2021
LYNNWOOD WATER CORPORATION	IL0995336	1	ONLY ONE WELL	110	8/26/2020
LYNWOOD 3RD ADDITION	IL0735280	1	ONLY ONE WELL	100	1/6/2021
M C L W SYSTEM, INC.	IL1315150	1	ONLY ONE WELL	98	7/10/2020
MACOMB	IL1090350	5	INADEQUATE CLARIFIER CAPACITY	11309	12/14/2016
MAQUON	IL0950350	5	ONLY ONE WELL	284	1/13/2021
MARSEILLES SOUTH	IL0990110	1	ONLY ONE WELL	100	8/26/2020
MASON CITY	IL1250350	5	INADEQUATE STORAGE CAPACITY	2558	1/1/2006
MAYFAIR SUBDIVISION	IL1795750	5	ONLY ONE WELL	90	12/11/2020
MC NABB	IL1550150	1	ONLY ONE WELL	310	6/11/2020
MILL POINT MHP	IL2035165	1	ONLY ONE WELL	160	12/4/2020
MOUND CITY	IL1530100	7	ONLY ONE WELL	588	6/5/2020
MOUND PWD	IL1635050	6	INADEQUATE PLANT CAPACITY	2200	6/17/1996
MOUNT MORRIS ESTATES MHP	IL1415185	1	ONLY ONE WELL	395	7/15/2020
MOUNT VERNON ASSOCIATION INC.	IL0855100	1	ONLY ONE WELL	490	1/8/2021
NORTH HAZELWOOD SUBDIVISION	IL0735850	1	ONLY ONE WELL	100	1/8/2021
NORTH HENDERSON	IL1310300	1	ONLY ONE WELL	187	7/2/2020
OAK GROVE MHP - ROCK ISLAND COUNTY	IL1617785	1	ONLY ONE WELL	100	12/2/2020
OAK LAWN MHP	IL0075275	1	ONLY ONE WELL	460	1/27/2021
OAK VIEW ESTATES	IL0730120	1	ONLY ONE WELL	95	1/29/2021
OAKWOOD WEST SUBDIVISION	IL0730070	1	ONLY ONE WELL	45	1/29/2021
OPHIEM PWS	IL0735150	1	ONLY ONE WELL	100	1/8/2021
OTTAWA ESTATES MHP	IL0995225	1	ONLY ONE WELL	115	8/26/2020
PARADISE MANOR MHP	IL1617665	1	ONLY ONE WELL	200	11/20/2020
PARK MEADOWLAND WEST MHP	IL0075235	1	ONLY ONE WELL	100	1/27/2021
PAULS MHP	IL0975485	2	ONLY ONE WELL	38	8/28/2020
PHIL-AIRE ESTATES MHP	IL2015625	1	ONLY ONE WELL	80	12/4/2020
POLO DR AND SADDLE RD SUBDIVISION	IL0437000	1	ONLY ONE WELL	93	1/29/2021
PORT BARRINGTON SHORES SUBDIVISION	IL0971120	2	ONLY ONE WELL	67	8/26/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
POWERS WATER CO., INC	IL0895550	2	ONLY ONE WELL	214	1/8/2021
PRAIRIE OAKS ESTATES HOMEOWNERS ASSOCIATION	IL0630060	2	ONLY ONE WELL	107	1/29/2021
PRAIRIE PATH WATER - CAMELOT**	IL1975200	2	ONLY ONE WELL	575	12/9/2020
PRAIRIE PATH WATER - CHERRY HILL WATER COMPANY**	IL1975280	2	ONLY ONE WELL	624	12/9/2020
PRAIRIE VIEW WATER ASSOCIATION	IL1795900	5	ONLY ONE WELL	35	12/11/2020
QUINCY	IL0010650	5	INADEQUATE CLARIFIER CAPACITY	45000	8/3/2016
RAINBOW LANE MHP	IL2015645	1	ONLY ONE WELL	83	12/4/2020
RAINBOW RIDGE	IL1615580	1	ONLY ONE WELL	46	8/14/2020
REDDICK	IL0914780	2	ONLY ONE WELL	210	1/8/2021
RIDGEWOOD LEDGES WATER ASSOCIATION	IL1615670	1	ONLY ONE WELL	430	6/24/2020
ROLLING GREEN ESTATES MHP	IL1415245	1	ONLY ONE WELL	215	7/17/2020
RUSTIC ACRES WATER ASSOCIATION	IL0735500	1	ONLY ONE WELL	260	1/6/2021
SANTA FE ESTATES WATER ASSOCIATION	IL1435490	5	ONLY ONE WELL	84	7/29/2020
SEATON	IL1310350	1	ONLY ONE WELL	200	7/2/2020
SENECA MOBILE HOMES LLC	IL0995425	1	ONLY ONE WELL	73	8/26/2020
SIX OAKS MHP	IL2015685	1	ONLY ONE WELL	48	12/4/2020
SPIN LAKE HOMEOWNERS ASSOCIATION	IL1135140	4	ONLY ONE WELL	200	6/16/2020
STELLE COMMUNITY ASSOCIATION	IL0535100	4	ONLY ONE WELL	100	1/29/2021
STORYBOOK HIGHLANDS	IL0935250	2	ONLY ONE WELL	100	1/13/2021
STRATFORD WEST APARTMENTS	IL1095200	5	ONLY ONE WELL	44	8/26/2020
STRAWN	IL1050700	4	ONLY ONE WELL	133	8/26/2020
SUBURBAN HEIGHTS SUBDIVISION	IL1615800	1	ONLY ONE WELL	57	11/20/2020
TENNANTS SHADY OAKS SUBDIVISION	IL1615540	1	ONLY ONE WELL	44	8/14/2020
TIMBER BROOK ESTATES	IL0735450	1	ONLY ONE WELL	120	1/6/2021
TIMBER RIDGE SUBDIVISION	IL0735470	1	ONLY ONE WELL	120	1/6/2021
TISKILWA	IL0111050	1	INADEQUATE STORAGE CAPACITY	830	9/20/2017
TOWER RIDGE SUBDIVISION	IL1615780	1	ONLY ONE WELL	70	11/20/2020
VAN ORIN WATER COMPANY	IL0115000	1	ONLY ONE WELL	100	1/27/2021
VICTORIA	IL0950550	5	ONLY ONE WELL	316	1/13/2021
WATER WERKS	IL1615130	1	ONLY ONE WELL	90	8/5/2020
WATERMAN	IL0370600	1	ONLY ONE WELL	1506	1/27/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
WHITE HALL	IL0610400	6	INADEQUATE STORAGE CAPACITY	2900	10/1/2012
WINDCREST SUBDIVISION	IL0730040	1	ONLY ONE WELL	40	1/29/2021
WINDING CREEK ESTATES	IL1615850	1	ONLY ONE WELL	160	11/20/2020
WINSLOW	IL1770550	1	ONLY ONE WELL	350	12/2/2020
WITT	IL1350850	5	INADEQUATE TREATMENT CAPACITY	991	3/17/2008
YATES CITY	IL0950700	5	ONLY ONE WELL	750	1/13/2021
YOUNGS HILLCREST MHP	IL0190040	4	ONLY ONE WELL	34	1/27/2021

TABLE D

Baseline Data from CR and Master NOV List

2021

Deficiency Type	Amount
Only 1 Well	137
Lack of Certified Operator	5
Lead and Copper	6
Monitoring	9
DBP MCL	10
Manganese MCL	0
Treatment Capacity	8
Issue CCR	0
Radium MCL	5
Storage Capacity	4
Source Capacity (not well)	2
Managerial Capacity	1
MOR Submission	1
Maintain Cl^- Residual	2
Cross Connection Program	2
Nitrate MCL	1
Material Inventory	1
Arsenic MCL	1
E. Coli MCL	0
Emergency Op Plan	1
Permit Needed	3
Back-up Power	0
Combined Filter Effluent	3
Chlorine MRDL	1
Well Abandonment	1

TABLE E

2022 Data from CR and Master NOV List

2022

Deficiency Type	Amount
Only 1 Well	136
Lack of Certified Operator	15
Lead and Copper	13
Monitoring	13
DBP MCL	13
Manganese MCL	9
Treatment Capacity	8
Issue CCR	7
Radium MCL	4
Storage Capacity	4
Source Capacity (not well)	3
Managerial Capacity	3
MOR Submission	3
Maintain Cl^- Residual	3
Cross Connection Program	3
Nitrate MCL	2
Material Inventory	2
Arsenic MCL	1
E. Coli MCL	1
Emergency Op Plan	1
Permit Needed	1
Back-up Power	1
Combined Filter Effluent	1
Chlorine MRDL	1
Well Abandonment	0

Table F

New Non-Community Water Supplies

From State FY 2019 Through FY 2022

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162628	Acreage Holdings	P	10-2-19	No	Not Active
IL3162651	Swedish Covenant Hospital	A	11-7-19 – P 2-10-22 - A	No	No
IL3162669	Nussbaum Properties #2	A	11-8-19 – P 2-16-22 - A	No	Yes
IL3162727	HARRIS REBAR	A	12-20-19	No	Yes
IL3162735	DEVANSOY INC	A	12-23-19	No	Yes
IL3162743	NUESTRO QUESO - EXTERIOR WELL	A	12-23-19	No	Yes
IL3162750	NUESTRO QUESO - INTERIOR WELL	A	12-23-19	No	Yes
IL3162867	Loves Travel Stop	P	1-7-20 – P 1-18-22 - A	No	Yes
IL3163121	Blessing Hospital	P	4-22-20	No	Not Active
IL3163014	SPECTRUM PREFERRED MEATS	A	5-13-20	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163204	Tree House Foods	P	7-10-20	No	Not Active
IL3163147	SERENITY HOSPICE & HOME	A	7-22-20	No	Yes
IL3163287	Illinois Marine Towing	P	10-9-20	No	Not Active
IL3163311	Blunier Builders	P	10-30-20	No	Not Active
IL3163360	ST PETER LUTHERAN CHURCH/SONSHINE CHRIST	A	11-6-20	No	No
IL3162883	WEDRON SILICA PIT BUILDING	A	11-10-20	No	Yes
IL3163188	US SILICA OTTAWA SOUTH PIT	A	11-25-20	No	Yes
IL3162354	CHICAGO AUTISM ACADEMY	A	11-25-20	No	Yes
IL3163527	Morris Hospital	P	12-3-20	No	Not Active
IL3162461	AVOCATE CHRIST MEDICAL CENTER	A	12-8-20	No	Yes
IL3163162	SPANCRETE INDUSTRIES INC.	A	12-8-20	No	Yes
IL3162131	JUGANDO SE APRENDE	A	12-17-20	No	No
IL3162313	BRANDT INDUSTRIES USA LTD	A	12-28-20	No	Yes
IL3162610	ALLOY SPECIALTIES (10500320)	A	12-29-20	No	Yes
IL3163097	LAUNCH ENRICHMENT L3C	A	12-31-20	No	Yes
IL3163600	McHenry Hospital	P	1-8-21	No	Not Active
IL3162842	NORTHWESTERN COMM HOSP OUTPT CARE CTR	A	1-12-21	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3161992	CATERPILLER - PEORIA PROVING GROUNDS	A	1-15-21	No	Yes
IL3163626	PHARMACANN	A	1-15-21	No	Yes
IL3163667	Alexian Brothers Medical Ctr	P	2-12-21	No	Not Active
IL3162099	WILLOW CREEK COMMUNITY CHURCH	P Changed to Transient	3-15-21	No	NA
IL3163691	VIRGIL FARM NORTH	I	3-16-21 – P 11-15-21 - I	No	Not Active
IL3162297	MEADOW LANE SCHOOL	A	4-2-21	No	Yes
IL3163725	Northwestern Medicine Woodstock Hospital	A	4-5-21 – P 2-9-22 - A	No	No
IL3161828	NORTHERN WHITE SANDS LLC	A	4-15-21	No	Yes
IL3163782	WOODSMOKE RANCH	Changed to Transient 2-22-22	4-16-21	No	NA
IL3163824	MULLER-PINEHURST DAIRY	A	4-21-21	No	Yes
IL3163832	THE MOSQUITO AUTHORITY	I	4-21-21 – P 1-6-22 - I	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163875	CORE FX INGREDIENTS	A	4-23-21	No	Yes
IL3163907	CHURCH ON THE ROCK	Changed to Transient 3-15-22	4-23-21	No	NA
IL3163519	RAY TRAPP - OFFICES/WAREHOUSE	I	5-20-21	No	Not Active
IL3164020	OSF St. Francis Hospital	P	5-21-21	No	Not Active
IL3163253	HIGHLAND PARK HOSPITAL	A	5-28-21	No	Yes
IL3164129	Sygenta	p	7-22-21	No	Not Active
IL3164111	SMOKIN'Z BBQ LLC	A	7-26-21	No	No
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	No
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	No
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	No
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 - A	No	Yes

State of Illinois

Capacity Development Strategy

Revised February 28, 2023

Prepared by:

Illinois Environmental Protection Agency &

Illinois Department of Public Health

Contents

1.0 New System Program

1.1 Regulations on New System Capacity Demonstration

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement which can be found in Title 35 of the Ill. Adm. Code Part 652 and Title 77 of the Ill. Adm. Code Part 900. In Illinois, the Illinois Environmental Protection Agency (IEPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) regulates non-community water supplies (NCWS).

1.2 New System Control Points

The IEPA relies on existing construction and operating permit requirements as control points for evaluating the capacity of new CWS systems. New CWS systems are defined in 35 Ill. Adm. Code 601.105 as a CWS constructed after October 1, 1999 and supplies that expand their infrastructure to serve or intend to serve at least 15 service connections used by residents or regularly serves at least 25 residents. During the construction permit review for a new CWS system the IEPA requires the new CWS to submit a capacity demonstration that meets the requirements of 35 Ill. Adm. Code 652.310 which includes the demonstration of TMF capacity. The IEPA will not issue an operating permit for a new CWS until an approvable capacity demonstration has been received. The IDPH relies on existing construction permit requirements as control points for evaluating the capacity of new NTNCWS systems.

The IEPA and IDPH evaluate the effectiveness of the new system capacity development program each year when the annual capacity development report is drafted. All new public water supply system Enforcement Targeting Tool (ETT) scores are reviewed for the past three years to determine the percentage of systems that have an ETT score above 11. This percentage will indicate whether or not the new system program is effective and, if necessary, the program will be re-evaluated.

2.0 Existing System Program

2.1 Methods or Criteria Used to Identify and Prioritize Water Systems in Need of Improving TMF Capacity

In order to identify and prioritize CWS and NCWS systems in need of improving technical, managerial and financial capacity the following prioritization levels were defined in the 2005 Capacity Development Report and will continue to be utilized by IEPA and IDPH. The description of each prioritization level was updated from the previous report to reflect current practices.

2.1.1 CWS Priorities

Priority One Supplies

The first priority of the IEPA will be CWS systems that have a significant deficiency as defined in 35 Ill. Adm. Code 611.101. A significant deficiency includes a defect in design, operation, or maintenance, or a failure or malfunction of the source, treatment, storage, or distribution system that causes or has the potential for causing the introduction of contamination into the water delivered to customers. IEPA's enforcement procedures protocol ensures that non-compliant CWS supplies receive formal enforcement within 180 days of the IEPA's awareness of the violation. Thus, the IEPA has Compliance Commitment Agreements with schedules for all significant deficiencies unless the system is referred to the Attorney General's Office.

Priority Two Supplies

The second priority of the IEPA will be CWS systems identified to have regulatory deficiencies found during site inspections or Permit Section investigations that either violate a maximum contaminant level, treatment technique, source water quantity, treatment unit loading rate, storage volume, or minimum pressure requirement. These deficiencies are then added to the IEPA Restricted Status List. As defined in 35 Ill. Adm. Code Part 602.106, restricted status is the IEPA's determination that a CWS facility, or portion thereof, may no longer be issued a construction permit without causing a violation of the Act, Pollution Control Board (Board) or IEPA rules. The second priority will also include CWS systems identified to exceed 80 percent of the rate of any of the quantity requirement in the Board's or IEPA's rules and will be placed on the Critical Review List. Any CWS placed on the critical review or restricted status is sent a notification letter. The Board publishes a copy of the combined critical review and restricted status list every three months and the IEPA posts this list on its website.

Both Permit Section and Field Operations personnel work with these facilities to address problems and provide technical assistance. Problems may be addressed through additions or improvements to existing facilities or construction of new facilities using the State Revolving Loan Fund or other low interest loans. Operational problems are addressed primarily through Field Operation's onsite assistance. Some problems are referred to the Illinois Rural Water Association for assistance. In these situations, Field Operations personnel work closely with Illinois Rural Water circuit riders to help the supplier and staff improve operations.

Priority Three Supplies

The third priority of the IEPA will be CWS systems with any other deficiencies or recommendations found during observations by FOS personnel, compliance tracking or permit reviews. Some examples of these types of deficiencies are: reductions in operational staff; lack of a capital improvement plan; increasing operational problems; resource shortages; perceived inability to maintain compliance with new or proposed operational requirements or regulations; lack of an asset management plan; or any deficiencies noted on the TMF pre-screening survey.

2.1.2 NCWS Priorities

Priority One Supplies

Those NCWS systems that have maximum contaminant level or treatment technique violations or significant deficiencies will be the first priority of IDPH. Existing regulations allow the IDPH to require reports to ensure compliance. These supplies may also be subject to formal enforcement following the IDPH Enforcement Standard Operating Procedure.

Priority Two Supplies
NCWS systems that have accrued multiple monitoring violations will be targeted as a second priority. IDPH regional office and local health department staff review sampling requirements during the annual or biennial sanitary survey. In some offices, field staff perform the collection of all or some samples. Reminder letters are sent each quarter to NCWS operators and officials, advising them of sampling dates and any open monitoring violations. All NCWS are sent a Coliform Bacteria and Nitrate/Nitrite sample schedule letter at the beginning of each year. The IDPH laboratory stopped doing Nitrate/Nitrite sampling for NCWS after 2015 which caused a drop in compliance rates that has slowly been re-established with private laboratories certified in Illinois. This needs to be maintained.

Priority Three Supplies
Supplies with minor operational or managerial issues, such as changes in ownership or late sample submission, will be addressed as a third priority. These supplies will be identified during sanitary surveys and as a result of periodic data submission reviews.

2.2 Factors that Encourage or Impair Capacity

2.2.1 CWS Factors

Factors Which Impair Capacity

1) Financial Constraints
Many small CWS are primarily residential communities. Some are small housing associations, subdivisions or mobile home facilities with public water supplies that serve a declining population or a population with fixed incomes. These supplies generally have difficulty operating in compliance as funds for certified personnel, equipment and capital improvements are limited.

2) Operator Constraints
Retention of certified operators is a concern for all CWS systems. With an aging workforce, systems can expect that many knowledgeable operators will retire in the coming years leaving systems scrambling to find qualified personnel. Finding qualified operators with proper certification may be especially difficult in small, rural communities.

3) Management Constraints
Although operators attend training for operator certification renewal credits, there is no incentive for CWS managers, official custodians or owners to attend training in Illinois. Certain topics currently offered by technical assistance providers in Illinois such as, state revolving loan funds or asset management would be best presented to managers of CWS systems instead of operators. Operators are most often only involved in identifying operational needs but it is up to management to fill out loan applications and make other financial decisions for CWS systems.

4)Regulatory Constraints
Although the Safe Drinking Water Act does require Illinois to develop a capacity program for existing systems, IEPA does not have authority to require existing facilities to demonstrate technical, managerial and financial capacity. The IEPA also does not have the authority to require asset management plans for CWS systems or require the regionalization of small CWS systems.

Factors Which Encourage Capacity Development

1) Operator Certification
Illinois has had a mandatory operator certification program since 1965. All public water supplies are required to employ at least one properly certified operator to be in charge of the treatment and/or distribution facilities. Operator education and certification are two key elements in facilitating both compliance and capacity. These two elements continue to serve as a foundation for water quality and regulatory compliance.

2) Water Supply Education
Professional water industry organizations and associations have, for many years, worked closely with the IEPA to offer a variety of educational workshops, symposiums, and seminars each year, at a number of locations throughout the state and online. The availability of educational opportunities will serve as a positive factor as Illinois implements continuing education training units needed for renewal of operator certification. A variety of educational opportunities for all those involved in the industry is essential in assisting water suppliers to develop and maintain capacity. IEPA will continue to support, encourage and participate in these efforts.

3) Cross-Connection Control
An important element of consumer education and distribution water quality protection is the implementation of cross-connection control by each public water supplier. Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. This requirement is an investment in protection of consumer health and safety and is important in maintaining capacity.

4) Permit Requirements for Construction and Operation
Illinois has maintained a water supply permit program for many years, under the Board of Health, prior to creation of the IEPA in 1970. This program provides an opportunity for oversight of not only new public water supply construction, but for any changes or modifications to source water, treatment or distribution facilities. The additional requirement of an operating permit before new or modified construction allows the IEPA to verify that the project was properly disinfected. Permit requirements allow the IEPA to assess each project to determine the ability of the water supply to operate in compliance. Capacity demonstrations are reviewed as a required element of all permit applications for new CWS systems.

5) State Revolving Loan Fund
Illinois continues to work to capitalize the Drinking Water State Revolving Loan Fund to the greatest extent possible. The availability of loan funds to assist non-compliant water suppliers and those suppliers who may experience compliance problems as a result of new regulations in the future is an important asset to the capacity development process. Bonus points in the prioritization of loans to be granted can be awarded to systems that implement an asset management plan or are developing an asset management plan.

6) Technical Assistance
IEPA regional offices regularly provide technical assistance to CWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone received from CWS

systems throughout the year. The IEPA also has a contract with IRWA, where IRWA provides technical assistance to public water systems. The IEPA field staff routinely advises CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with. IRWA provides technical assistance to public drinking water systems in Illinois with activities and issues including, but not limited to technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development.

7) Engineering Evaluations (Sanitary Surveys)
Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each CWS system. Field staff review the TMF survey prior to the site-visit and items of concern are discussed on-site at the time of evaluation. Field staff visually observe the facility and review on-site documents to evaluate the TMF capacity of existing systems in addition to reviewing the TMF pre-screening survey. Deficiencies noted in the previous engineering evaluation are followed-up on to determine if they have been remedied.

2.2.2 NCWS Factors

Factors Which Impair Capacity

The nature of a NCWS system, first and foremost, is a business or school. Any water provided is for the exclusive use of the employees or students, customers, etc. and, in some cases, to provide process water for the operation of the business. Routine requirements of the drinking water program are not always an ongoing concern to the management of the NCWS facility. IDPH regional office or local health department personnel communicate the need for compliance with drinking water requirements during site visits. Sampling and other regulatory requirements are provided from the Central Office through annual and quarterly mailings.

1) Personnel Changes
Frequent changes in on-site operational personnel pose an additional obstacle to NCWS compliance. An ongoing education and re-education process is essential. The IDPH strives to provide this information through regional office or local health department contacts whenever changes in personnel or management/ownership are reported.

2) Management Structure
Management of a NCWS systems, in many cases, takes on multiple roles with no formal chain of command. In some situations the same individual who orders supplies also keeps the books, serves customers, and performs all operational duties. When this one-man operation experiences illness, goes on vacation, or is otherwise not available, problems may develop within the NCWS. IDPH regional or local health department personnel work closely with these managers to educate and assist with water supply compliance.

Factors Which Encourage Capacity

1) Operator Certification
IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems in order to ensure that drinking water systems are properly operated. In order to be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have

been certified by IEPA as a public water supply operator. Certified operators shall be re-certified every three years. In order to be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session.

2) Permit Requirements
All new NTNCWS systems must submit a permit application to the IDPH prior to construction. Review is conducted by IDPH personnel to ensure that construction meets all IDPH requirements. Financial review is made to ensure that sampling costs and routine maintenance costs will be properly funded by the owner/official custodian of the supply. IDPH will use this review to emphasize the importance of safe drinking water to consumers and will begin the regulation education process at that time.

3) Technical Assistance During Sanitary Surveys
Technical assistance is provided on an individual basis during each routine sanitary survey. At the time of the survey, IDPH regional staff or local health department staff review all safe drinking water requirements including sampling, treatment techniques, operational procedures, and specific concerns of the facility. Improvements in operation can usually be seen following these visits, until personnel change or priorities within the business are altered.

2.3 Description of How the State Will Use its Authorities and Resources to:

2.3.1 Assist Public Water Systems in Complying with National Primary Drinking Water Standards

The Illinois General Assembly passed legislation amending Section 17.5 of the Illinois Environmental Protection Act (415 ILCS 5/17.5[1998]), which requires all federal regulations published under the Safe Drinking Water Act be adopted at the State level as "identical in substance" within 12 months of federal promulgation. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) was amended to require that CWS systems receive notification of any violations observed by representatives of the IEPA within 180 days of discovery of the violation. The IEPA has an internal enforcement process that escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable time frame, results in formal enforcement action.

The IDPH has traditionally sought compliance through cooperation and informal meetings when violations occur. In a small percentage of cases, NCWS owners are reluctant to voluntarily come into compliance. Under such circumstances, provisions of the Illinois Groundwater Protection Act, 415 ILCS 55/9, are used as the authority for the IDPH to develop and enforce regulations to require compliance. The Illinois Drinking Water Systems Code (77 Ill. Adm. Code 900) and the Primary Drinking Water Standards (35 Ill. Adm. Code Part 611) are the regulations cited for the formal enforcement process when required. The IDPH has adopted internal Enforcement Standard Operating Procedures (SOP) with implementation beginning July 1, 2022. This SOP sets up specific levels of enforcement based on violation type, number of violations and/or time in Non-Compliance status.

2.3.2 Encourage the Development of Partnerships

IEPA staff encourage CWS systems to interact and share information with each other frequently. Some examples include: asking neighboring systems for water quality information when conducting analogous system desktop corrosion control studies; utilizing chemical testing equipment of another supplier to

compare results to determine if equipment is properly calibrated; or what a neighboring system with similar treatment and storage has in terms of an operational management plan.

The IEPA encourages CWS consolidation by awarding priority points to applicants for the drinking water state revolving loan fund that have projects that include system consolidation per 35 Ill. Adm. Code 662.345(e)(5). In addition to these priority points, the IEPA has made principal forgiveness available to systems with only one well to provide another source of water. Applicants will be scored and ranked for priority in accordance with 35 Ill. Adm. Code 662.345. Loan applicants must consider at least three alternatives and include a justification of the most feasible source alternative based upon financial considerations, operational requirements, operator qualifications, reliability and water quality. By requiring systems to provide alternatives and include justification the IEPA believes this will steer applicants towards considering system consolidation.

2.3.3 Assist Public Water Systems in the Training and Certification of Operators

The IEPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems. This program ensures that operators have the competency to make sure their system is able to provide water that is safe for ordinary domestic consumption and that CWS systems are maintaining adequate technical and managerial capacity. An operator certified as competent by the IEPA must be able to perform duties without endangering public health.

In order to determine competency, the IEPA must evaluate whether applicants for operator certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification.

To help ensure that certified drinking water operators' knowledge stays current, certified operators are also required to meet continuing education requirements to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third of the required training may be comprised of technical or non-technical/professional courses such as safety or management. In 2020 an increase in virtual and correspondence-type operator training courses became available due to the in-ability to meet in-person. The IEPA approves operator renewal training credit for virtual courses that meet the requirements in 35 Ill. Adm. Code 681.820.

IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems to ensure that drinking water systems are properly operated. An operator certified as competent by IDPH must be able to perform duties without endangering public health. To be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified by IEPA as a public water supply operator.

Certified operators shall be re-certified every three years. To be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session. New operator certification course and re-certification course providers both have provided virtual courses during the pandemic and will continue to have this ability as needed.

2.4 Establishing a Baseline and Measuring Improvements to Capacity

The IEPA established a baseline in its annual capacity development report submitted to the USEPA in September 2021 and this report was updated in September 2022. The baseline was established by taking data from the Master NOV Database, which tracks enforcement actions, as well as the Critical Review List. Critical Review is defined in 35 Ill. Adm. Code Part 602.107 as the IEPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or IEPA's rules. Any CWS placed on the Critical Review List is sent a notification letter. The IEPA publishes a copy of this list on its website and updates every three months. The Board publishes the list in the Environmental Register.

Each year the IEPA will measure improvements to capacity by comparing the past year's data obtained from the Master NOV Database and Critical Review List to previous baseline data. The IEPA is in the process of preparing to use the Safe Drinking Water Information System (SDWIS) to track CWS inspection deficiencies. In the future the IEPA will use the data in SDWIS to track capacity concerns found during site inspections, as well as the Master NOV Database and Critical Review List, and compare to baseline data to determine trends.

IDPH keeps track of violations cited and reported using SDWIS/State and spreadsheets with the various violation types listed. All violations and enforcement actions are tracked using SDWIS/State and querying the data with an interactive Access database. IDPH has also developed a new enforcement SOP which identifies systems in the highest priority of non-compliance. IDPH has not yet established a baseline but a baseline will be added to the 2023 fiscal year capacity development report by pulling data from SDWIS\State Violations to determine statewide trends.

2.5 Stakeholder Involvement

IEPA sought to obtain as much input into the development of the original Capacity Development Strategy for Existing Systems as practical. In order to achieve the goal of seeking input from all stakeholders, the Division of Public Water Supplies coordinated with the Illinois Section American Water Works Association (ISAWWA) Small Systems Committee to formulate an outreach plan. The ISAWWA Small Systems Committee is comprised of small system operators, operator association officers and members, water educational institution staff, Illinois EPA staff, consulting engineers, Illinois Rural Water Association staff, and a marketing representative. The consensus of the FOS staff and Small Systems Committee was to evaluate existing communication mechanisms already in place, and available to the BOW.

One existing advisory group consisted of statewide Groundwater Protection Planning and Education Committees. These groups are comprised of stakeholders from the general public, environmental advocacy groups, the agricultural community, water supply operators and officials, water industry organizations and associations, and local, state and federal governmental agencies. As an added benefit, these group members have an interest and commitment to drinking water issues, and are somewhat educated on all aspects of water supply programs in Illinois. The Groundwater Protection Planning and Education Committees were approached and asked to participate in the development of the Capacity Development Program for Illinois. Presentations were made to each of the five committees regarding the contents of the proposed regulations for new systems, and the basic

approach that would be used in the Strategy for Existing Systems. All committees spent meeting time discussing the programs and provided some comments for inclusion as a part of each discussion. These comments were used as the Strategy document evolved. Changes to the initial Strategy are based upon comments and experiences from Field Operations staff, Environmental Resources Training Center instructors, Illinois Rural Water Association training staff, water supply officials and operators, and other professional organization members who help to support capacity development efforts. These comments are made during and after workshops, seminars, conferences, and planning and assessment meetings.

Presentations which included an outline of the Capacity Development Program for both new and existing systems were made initially at two ISAWWA Small Systems Conferences, several ISAWWA regulatory workshops, the Illinois Potable Water Supply Operators Association Annual Conference, several Illinois Rural Water Association meetings, and at local operator association meetings. Comments and questions received during or following these presentations were also incorporated into the Strategy, as the document continued to grow and develop. Capacity demonstration elements are included in nearly all educational activities held in Illinois. Comments pertinent to the process and progress of capacity demonstration in Illinois are incorporated when received by participants of these activities.

In order to reach all interested parties not already aware of the initial Capacity Development Program, the topic was included in the annual Bureau of Water Program Plan Hearing in August 1999. Notice of this annual hearing is provided to the general public through official notification in various statewide official publications, on the Illinois EPA website, and through direct mail to citizen and environmental groups, industrial, institutional and commercial stakeholders, and to the water industry as a whole. Each Hearing Notice included a brief description of the program and provided interested persons with the name and address of a contact person to whom inquiries or questions could be directed. Attendees were invited to provide oral comment at the hearing, or to provide written comment following the meeting. Only two general questions were asked following the presentation. No written comment was provided. Response to questions was documented in the hearing transcript available to attendees or any others, upon request.

The IDPH established an advisory committee to deal with both Capacity Development and Operator Certification requirements of the SDWA Amendments of 1996, and to advise the IDPH on oversight of the drinking water program. This committee was called the Non-Community Public Water Supply Stakeholder Committee. Members were made up representatives from Illinois EPA Operator Certification program, two IDPH technical staff from the water supply program, one local health department representative, one non-community system operator responsible for nine school district water supplies, two individuals responsible for operations from very small non-community public water supply systems and one citizen advisor position. This committee reviewed the capacity development rules for new systems, operator certification rules for all non-transient systems, and the Strategy for Capacity Development for Existing Non-Transient Systems. All input provided was included as a part of the rule development process.

On October 26, 2021 Illinois held a virtual meeting to obtain stakeholder involvement on how the state could encourage the development of and help to assist in the implementation of asset management plans that meet the five-core question framework. Representatives from non-community organizations, community water supply organizations, USEPA, Environmental Finance Center, technical assistance providers and more provided input on Illinois' revised strategy. A complete list of organizations that

participated in the October 26, 2021 meeting can be found in Attachment A. The stakeholder's feedback was considered and used to help develop a multiple path approach described in Sections 2.3 and 2.4 below to promote and help implement asset management plans in Illinois.

3.0 Asset Management

The 2018 America's Water Infrastructure Act (AWIA), Section 2012, requires state drinking water programs to consider and include as appropriate asset management into their state capacity development strategies. Specifically, AWIA amends Section 1420(c)(2) of SDWA and requires Illinois to describe how it will (1) encourage development by public water systems of asset management plans that include best practices for asset management and (2) assist, including through technical assistance, public water systems in training operators in implementing asset management plans.

On December 2, 2019 the USEPA Office of Ground Water and Drinking Water (OGWDW) issued a memo to provide guidance to states on implementing the AWIA requirements. This memo defines asset management as a process for maintaining a desired level of customer service for public water systems to provide at the lowest life cycle cost and is addressed through the five-core-question framework. Illinois must describe how it will use the five-core question framework to promote the development of and provide technical assistance for implementing asset management plans. The five-core questions of asset management are:

1. What is the current state of the utility's assets?
2. What is the utility's required "sustainable" level-of-service?
3. Which assets are critical to sustained performance?
4. What is the utility's best "minimum life-cycle cost" capital improvement plan and operations and maintenance strategies?
5. What is the utility's best long-term financing strategy?

3.1 Encourage Development of Asset Management Plans

Illinois will encourage the development of asset management plans through a multiple path approach that involves the Drinking Water State Revolving Fund (DWSRF) program, operator training and the sanitary survey process. Illinois encourages public water systems to develop asset management plans by assigning priority points to drinking water state revolving fund loan applicants that are either developing or currently implementing an asset management plan pursuant to 35 Ill. Adm. Code 662.345(g).

In the past year Illinois has begun to work with Great Lakes Rural Community Assistance Program (RCAP) and Environmental Finance Center (EFC) by utilizing USEPA grant money to develop free asset management training programs for small public water system operators and managers in Illinois. RCAP provided a virtual training session on asset management in December of 2022 that was free to Illinois public water systems and RCAP and EFC plan to provide further virtual training sessions in 2023 at a date to be determined.

An asset management section will be added to the TMF pre-screening survey that is currently implemented in IEPA's engineering evaluations by May 31, 2023. IEPA drinking water FOS staff will receive training via the United States Environmental Protection Agency's (USEPA) TMF and asset management training modules. After the TMF pre-screening survey is updated the IEPA will include a

Commented [CD1]: Chris, please add something here.

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recommendation in their non-compliance advisory letters to develop an asset management plan, if one has not yet been created, or to update the system's existing plan to address all aspects of the five-core-question framework. The recommendation will include the web address of the Agency's asset management webpage discussed in Section 3.2 of this report.

IDPH will add an asset management section to their sanitary survey checklist. If the TMF pre-screening survey finds that the public water system does not have an asset management plan that incorporates all components of the five-core-question framework then a recommendation will be added to the sanitary service inspection letter advising the public water supply to address this deficiency.

3.2 Technical Assistance in Training and Implementation of Asset Management Plans

To provide technical assistance to public water system operators on implementing asset management plans Illinois has begun to work with RCAP and EFC to develop technical assistance programs by utilizing USEPA grant money. In order to maintain consistency across the technical assistance providers and ensure that the five-core question framework components are addressed in the asset management plans developed during the technical assistance, Illinois developed minimum criteria for small system asset management plans. These minimum criteria were shared with the technical assistance providers and can be found in Attachment B.

RCAP has begun to provide technical assistance to public water supplies in Illinois, both CWS and NCWS. EFC has begun to reach out to offer technical assistance to CWS and NCWS systems in Illinois. The IEPA's website includes a page on asset management. This webpage defines asset management and emphasizes the value that an asset management plan can provide to public water systems. The webpage also includes a discussion of the five-core-question framework and links to guides and tools developed by USEPA and others on developing asset management plans.

In the future, the IEPA plans to explore the possibility of requiring asset management plans for DWSRF loan applicants as well as for systems applying for a construction permit to increase capacity by greater than 20%. If the IEPA decides to require asset management plans then in-house staff would be hired to provide technical assistance to guide systems through the process of creating a plan. Additional staff may need to be hired in the loan program as well.

Attachment A: List of Stakeholder Organizations at October 2021 Meeting

- Illinois Department of Public Health
- United States Environmental Protection Agency – Region 5
- Environmental Finance Center
- United States Department of Agriculture – Rural Development
- American Water Works Association (IL Section)
- Chicago Metropolitan Agency for Planning
- Rural Community Assistance Partnership
- Illinois Manufactured Housing Association
- Illinois Potable Water Supply Operator Association
- Lake County Health Department
- American Camp Association (IL Section)
- Exelon Nuclear

Attachment B: Asset Management Minimum Criteria

ASSET MANAGEMENT PLAN MINIMUM CRITERIA FOR PUBLIC WATER SUPPLIES (PWS) WITH POPULATION <10,000 IN ILLINOIS		
DATE LAST MODIFIED: 3/09/2021		CREATED BY: ILLINOIS EPA

INTRODUCTION			
1. DEFINE THE GOALS OF THE SYSTEM			
2. PROVIDE AN OVERVIEW OF THE SYSTEM THAT INCLUDES (IF APPLICABLE):			
▪ System Name	▪ PWS ID	▪ Population	▪ Source Type
▪ Interconnections	▪ No. of LSLs	▪ Well Capacity (MGD)	▪ Plant Capacity (MGD)
▪ System Avg. Daily Pumpage (MGD)	▪ System Maximum Avg. Seven Day Pumpage (MGD)	▪ Emergency Water Source and Backup Power	▪ Unaccounted for Water Loss (%)

STAFF INFORMATION			
PROVIDE THE NAMES, TITLES AND RESPONSIBILITIES OF THE FOLLOWING PERSONNEL:			
▪ Owner	▪ Manager	▪ Financial Contact	▪ Certified Operator
▪ Sampler	▪ Head O&M Personnel	▪ Fiscal Team	

LEVEL OF SERVICE
1. DEFINE TARGETED LEVEL OF SERVICE GOALS
2. IDENTIFY IF YOUR SYSTEM IS CURRENTLY ABLE TO MEET THE SET GOALS AND EXPLAIN WHY OR WHY NOT
3. DESCRIBE THE PLAN TO MAINTAIN OR IMPROVE EXISTING PRACTICES TO MEET LEVEL OF SERVICE GOALS

ASSET INVENTORY
1. DEVELOP A LIST OF ALL SYSTEM ASSETS (E.G., SOURCE, TREATMENT, TRANSMISSION AND DISTRIBUTION INFRASTRUCTURE)
2. LIST THE YEAR EACH ASSET WAS CONSTRUCTED OR INSTALLED

3. LIST THE ESTIMATED LIFE EXPECTANCY OF EACH ASSET
4. LIST THE REMAINING USEFUL LIFE[2] OF EACH ASSET
5. RATE THE CONDITION (1-5)[1] OF EACH ASSET
6. RATE THE PROBABILITY OF FAILURE (1-5)[3] OF EACH ASSET
7. RATE THE SYSTEM IMPACT (1-5)[4] OF EACH ASSET
8. LIST THE ASSOCIATED RISK SCORE[5] OF EACH ASSET

[1]

Score	Condition	Description
1	Excellent	New or relatively new condition. Asset has required little to no preventative or corrective maintenance.
2	Good	Acceptable condition. It still functions and requires minor preventative or corrective maintenance.
3	Fair	Deterioration of the asset can be seen. It needs preventative or corrective maintenance frequently to be able to function.
4	Poor	Failure of the asset is likely and will need to be replaced in the next few years.
5	Very Poor	Failure has occurred or is going to occur. Major maintenance is required, or replacement needs to occur.

[3]

Score	Probability of Failure
1	Highly Unlikely
2	Unlikely
3	Likely
4	Very Likely
5	Imminent

[4]

Score	System Impact	Description
1	Insignificant	Can continue normal operations of the water system without this asset.
2	Minor	Redundant systems in place; loss of the asset has a minor impact on the ability of the system to operate.
3	Moderate	Some redundancy in place; loss of the asset has a moderate impact on the ability of the system to operate.
4	Major	Greatly reduced capacity (major impact) to operate water system without this asset.
5	Catastrophic	Cannot operate water system without this asset.

[2] ***Remaining / Adjusted Service Life***: *Remaining or adjusted service life will be the difference between the current year and the year an asset was installed /constructed. This value may change depending on specific asset maintenance practices and current asset condition rating.*

[5] ***Risk Score*** *is a number which is the result of Probability of Failure Score multiplied by System Impact Score.*

Note: The above Tables were developed by the Connecticut Department of Public Health and included in the "Fiscal and Asset Management Plan for Community Water Systems Serving less than 1,000 Residents"

OPERATION AND MAINTENANCE				
1. SUBMIT THE SYSTEM'S OPERATIONAL AND MAINTENANCE ACTIVITIES. THESE SHOULD INCLUDE:				
▪ STANDARD OPERATING PROCEDURES	▪ EMERGENCY OPERATING PROCEDURES	▪ ROUTINE MAINTENANCE	▪ PREVENTATIVE MAINTENANCE	▪ LIST SHARED O&M PARTNERSHIPS WITH OTHER SYSTEMS

CAPITAL IMPROVEMENTS
1. LIST FUTURE CAPITAL PROJECTS AND ASSOCIATED EXPENDITURES FOR PLANS TO ADD NEW ASSETS TO THE SYSTEM THAT IMPROVE EXISTING CAPACITY
2. LIST CURRENT ASSETS WITH THE TOP TEN HIGHEST RISK SCORES (TOP TEN ASSETS) FROM THE ASSET INVENTORY EXERCISE ABOVE, STARTING WITH THE HIGHEST SCORE FIRST
3. LIST THE ACTION REQUIRED TO IMPROVE THE TOP TEN ASSETS AND THE YEARS UNTIL ACTION IS REQUIRED

4. LIST THE APPROXIMATE TOTAL COST OF THE ACTIONS REQUIRED TO IMPROVE THE TOP TEN ASSETS
5. LIST THE RESERVES REQUIRED EACH YEAR TO IMPROVE THE TOP TEN ASSETS

FINANCIAL STRATEGY
1. DESCRIBE THE SYSTEM'S CURRENT RATE STRUCTURE AND PLANS FOR FUTURE RATE MODIFICATIONS
2. DESCRIBE ALL TYPES OF FINANCIAL ACCOUNT(S) MAINTAINED BY THE WATER SYSTEM AND WHICH ACCOUNT(S) WILL BE USED TO PAY FOR PLANNED CAPITAL IMPROVEMENT PROJECTS
3. SPECIFY ALL SOURCES OF PWS REVENUE AND ASSOCIATED AMOUNTS FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR
4. SPECIFY ALL PWS OPERATING EXPENSES FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR
5. SPECIFY EMERGENCY FUND ACCOUNT BALANCE FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR
6. SPECIFY RESERVE FUND ACCOUNT BALANCE FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR WITH TOTAL ANNUAL RESERVES REQUIRED FOR CAPITAL IMPROVEMENTS ACCOUNTED FOR
7. SPECIFY DEBT ACCOUNT BALANCE FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR
8. SPECIFY ADDITIONAL FUNDS NEEDED FOR PROGRAMS (I.G. SOURCE WATER PROTECTION PLANS, ASSET MANAGEMENT PLANS, ETC.)
9. DESCRIBE HOW OFTEN THE WATER SYSTEM REVENUES AND EXPENSES ARE REVIEWED AND BY WHOM THEY ARE REVIEWED
10. SPECIFY NET INCOME OR LOSS (REVENUE – (OPERATING EXPENSES + EMERGENCY FUND + RESERVE FUND + DEBT + ADDITIONAL FUNDS NEEDED)) FOR ACTUAL LAST YEAR, BUDGET CURRENT YEAR AND PROJECTED NEXT YEAR
11. IF THE SYSTEM IS PROJECTED TO HAVE A NET LOSS DESCRIBE HOW THE PWS PLANS TO ACQUIRE ADDITIONAL FUNDS
12. DESCRIBE HOW WATER BILLS ARE COLLECTED AND HOW MANY CUSTOMERS HAVE UNPAID OR DELINQUENT ACCOUNTS

UNACCOUNTED FOR WATER LOSS
1. DETERMINE THE AMOUNT OF ANNUAL UNACCOUNTED FOR WATER LOSS
2. DETERMINE THE CAUSE FOR UNACCOUNTED FOR WATER LOSS
3. DESCRIBE THE MEASURES BEING TAKEN TO REDUCE THE AMOUNT OF UNACCOUNTED FOR WATER LOSS

COMPLIANCE

1. DESCRIBE THE SYSTEM'S COMPLIANCE HISTORY WITH STATE AND FEDERAL DRINKING WATER REGULATIONS ALONG WITH PLANS FOR MEETING FUTURE REQUIREMENTS
2. LIST ANY SIGNIFICANT DEFICIENCIES AS DETERMINED BY THE STATE AND ASSOCIATED FOLLOW-UP ACTIONS

PREPAREDNESS
1. DESCRIBE SECURITY MEASURES USED TO ENSURE SAFE, CONTINUOUS OPERATIONS
2. CONFIRM WHETHER OR NOT THE PWS'S EMERGENCY RESPONSE PLAN IS BEING IMPLEMENTED
3. DESCRIBE ANY CONTINGENCY PLANS USED TO ENSURE CONTINUITY OF SERVICE

Illinois' PWS Capacity Development Program

Annual Status Report

State Fiscal Year 2023

(July 1, 2022 – June 30, 2023)

Prepared by:

Illinois Environmental Protection Agency &

Illinois Department of Public Health

Contents

1.0 Introduction

The 1996 Safe Drinking Water Act (SDWA) required all states to develop and implement a new system's program and existing system strategy for capacity development. Subsequently, Illinois had to ensure that all new community water supplies (CWS) and all new non-transient non-community water supplies (NTNCWS) commencing operation after October 1, 1999 had adequate technical, managerial and financial (TMF) capacity before commencing operation. Illinois adopted regulations to implement this requirement which can be found in 35 Ill. Adm. Code Part 652 and 77 Ill. Adm. Code Part 900.

Illinois also had to develop and implement a strategy to help all existing CWS and Non-Community Water Supplies (NCWS) achieve and maintain TMF capacity beginning October 1, 2000. Illinois submitted a Capacity Development Strategy for existing public water supplies in July 2000 to the United States Environmental Protection Agency (USEPA) and the Strategy was approved by the USEPA on September 27, 2000. Illinois submitted a Revised Capacity Demonstration Strategy in December 2022 and the final version of the strategy was approved by USEPA in May 2023. In Illinois, the Illinois Environmental Protection Agency (Illinois EPA) regulates CWS systems while the Illinois Department of Public Health (IDPH) regulates NCWS systems.

2.0 New Systems Program Annual Reporting Criteria

2.1 Legal Authority

2.1.1 CWS

Illinois' legal authority to implement the New Systems Program for CWS systems can be found in 35 Ill. Adm. Code Part 652 Subpart C. No modifications have been made to this Subpart in State Fiscal Year (FY) 2023.

2.1.2 NCWS

Illinois' legal authority to implement the New Systems Program for NCWS systems can be found in 77 Ill. Adm. Code 900.45. No modifications have been made to this Subpart in State FY 2023.

2.2 Modifications to Control Points

2.2.1 CWS

The Illinois EPA relies on existing construction and operating permit requirements as control points for evaluating the capacity of new CWS systems. In the last three years, new CWS systems do not have a history of non-compliance with regulations and/or other TMF related issues and therefore control points were not modified in State FY 2023.

2.2.2 NCWS

The IDPH relies on existing construction permit requirements as control points for evaluating the capacity of new NCWS systems. The majority of new NCWS systems in the last three years do not have a history of non-compliance with regulations and/or other TMF related issues.

2.3 List of New Systems in Last 3 Years

2.3.1 CWS

For the past 3 State Fiscal Years, 28 CWS have become active or are in the process of becoming new systems. Table A lists these systems, their activity status, activity date and indicates if their enforcement targeting tool (ETT) score is above 11. None of these systems have ETT scores above 11 (0% of the total new system for last 3 State Fiscal Years). The Illinois EPA believes that this percentage is an indicator that the New Systems Program for CWS systems is effective.

2.3.2 NCWS

For the past 3 State Fiscal Years, 49 NCWS systems have become active or are in the process of becoming new systems. Table F lists these systems, their activity status, activity date and if their ETT score exceeds 11. Only one of these NCWS systems has an ETT score above 11 which was due to a delay in getting an operator and getting behind in sampling. The systems have since returned to compliance. The control point for certified operators shows all active systems have an operator. The IDPH believes that this is an indicator that the New Systems Program for NCWS systems is effective.

3.0 Existing System Strategy

3.1 Existing Program Overview

3.1.1 CWS

The Illinois EPA uses a combination of tools to assist existing CWS systems in acquiring and maintaining TMF capacity. These tools include engineering evaluations, enforcement actions, permit requirements for construction and operation, the Drinking Water State Revolving Fund (DWSRF), Source Water Protection Program, monitoring requirements, Operator Certification Program, cross-connection control, and technical assistance.

Engineering Evaluations

The Illinois EPA conducts periodic inspections of all CWS systems to determine if their ongoing programs for monitoring, maintaining the water supply, and providing appropriate information to the water users meets the requirements of the Illinois Pollution Control Board's (Board) public water supply regulations and related standards. Inspections are conducted for each CWS system approximately every three years with priority given to systems with a population greater than 10,000 and surface water supplies. Inspections may also be conducted to follow-up on significant deficiencies noted in the previous inspections as well as emergency situations. Across all regions of Illinois, 491 inspections were conducted in the 2023 State FY.

Field staff visually observe the facility and review on-site documents to evaluate the TMF capacity of existing systems. Prior to conducting a site-visit, a TMF pre-screening survey is sent to the official custodian and responsible operator in charge of each public water supply. The TMF pre-screening survey assists systems in acquiring and maintaining TMF capacity because it allows the system and inspectors to identify areas of capacity that could be improved upon. In October 2022, an inspection was conducted for a small community water supply. The TMF survey indicated that the system did not have an up-to-date Cross Connection Control Survey or Emergency Operations Plan. Illinois EPA field staff discussed 35 Ill. Adm. Code Subtitle F requirements and referred the system to the Illinois Rural Water Association website for further information. The system has since responded that the Emergency Operations Plan is in the process of being updated and the cross-connection survey was sent out February 2023.

In the past year, the Illinois EPA updated the TMF pre-screening survey to include a section on asset management and updated existing sections to include climate resiliency measures, cybersecurity measures and more. A copy of the TMF pre-screening survey can be found in Attachment 1 of this report.

Once the engineering evaluation is complete, field staff send a non-compliance advisory letter to the CWS system notifying them that the inspection was completed and any regulatory deficiencies and/or recommendations are provided as attachments. The Illinois EPA added language to these letters recommending that systems without an asset management plan or without a plan that meets the five-core question framework begin to develop an asset management plan. The recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. CWS systems are then required to respond to deficiencies noted within 45 days. The response must detail the steps that have been or will be taken to correct these deficiencies.

If an adequate response is not received within 30 days from the date of an inspection letter, the public water supply may be added to the Restricted List for any significant deficiencies that fall under one of the following categories: maximum contaminant level violations, treatment technique violations, source water quantity requirements, treatment unit loading rates, storage volume requirements, and distribution minimum pressure requirements. If the inspection finds that the CWS system exceeds 80 percent of the rate of any of the Board or Agency's quantity requirements the system will be added to the Critical Review List. For further discussion on the Critical Review list please see Section 3.2.1 below. Deficiencies that violate the SDWA will simultaneously be entered into the enforcement process. Deficiencies that do not violate the SDWA can also be followed-up with enforcement actions as requested.

The Illinois EPA has taken steps towards utilizing the Safe Drinking Water Information System (SDWIS) to track inspection deficiencies. The Agency has trained field engineers to enter deficiencies found during site inspections into SDIWS. The Field Operations Section enters this data into SDWIS. The Illinois EPA will use this data in the future to track the number and type of

deficiencies found during engineering evaluations. The number and type of deficiencies found each year will be compared to baseline data to determine capacity trends.

Enforcement Actions

In Illinois, violations of the SDWA result in the system entering the enforcement process. The enforcement process allows the Illinois EPA to identify and address violations that are a direct result of inadequate TMF capacity. By requiring systems to address the violations, the TMF capacity of existing systems are improved. The Illinois EPA internal enforcement process escalates in an orderly fashion to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time results in formal enforcement action. Section 31 of the Illinois Environmental Protection Act (415 ILCS 5/31) requires that CWS systems receive notification of any violations observed by representatives of the Illinois EPA within 180 days of discovery of the violation.

Actions or deficiencies that constitute enforcement actions include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, permit violations, any operational issues that lead to immediate short-term health threats, and lack of a certified operator. Other deficiencies found during site-inspections or permit section investigations can also be trigged into the enforcement process if requested. All enforcement actions are tracked using the State's Master Notice of Violation (NOV) Database. A list of violation notices and descriptions of the violations issued in State FY 2023 are shown in Table B of this report.

DWSRF

Illinois continues to work to capitalize the DWSRF for communities in need of financial capacity assistance. Providing low-interest loans to public water systems allows them to have the financial capacity to make necessary improvements to infrastructure and ensure compliance with drinking water regulations. For State FY 2023 the Illinois EPA issued approximately $338,426,372 in loans from the Public Water Supply Loan Program (PWSLP) of which approximately $53,965,289 went to loan applicants, in the form of principal forgiveness, who qualified for lead service line replacement funding, and $339,433 went to loan applicants who qualified for the "small system compliance assistance principal forgiveness". The small system compliance assistance principal forgiveness was made available to CWS systems with a health-based maximum contaminant level violation. Eligible projects must result in the system with a history of health-based violations returning to compliance and must meet the following requirements: have an enforcement action initiated by the Illinois EPA, a population with a median household income below the State average median household income, and must serve fewer than 1,500 customers.

Pursuant to 35 Ill. Adm. Code Part 662.130, public water supplies are ineligible for financial assistance under the PWSLP if they lack the technical, financial, and managerial capability to ensure compliance with the requirements of SDWA, unless the assistance will ensure compliance. The DWSRF program is an essential tool for systems to have the financial means to achieve adequate technical capacity. Pursuant to 35 Ill. Adm. Code Part 662.345, loan projects

can be given additional priority points if the project includes the consolidation of two systems, removes applicants from the Restricted Status/Critical Review List, remedies health violations, or replaces lead service lines. Priority points are also given to applicants who are developing or implementing a source water protection plan or asset management plan.

Illinois EPA entered a $250,000 contract for an initial two-year term (FY2019 and FY2020) with the Illinois Rural Water Association to assist public drinking water systems in Illinois with activities and issues including, but not limited to, technical training of staff, assistance with compliance related issues, user charge analysis, asset management activities, overall system analysis, water-loss analysis, and capacity development issues. The contract was renewed in FY2023 for five years running from July 1, 2023, through June 30, 2028, and will now be funded using the Local Assistance & Other Set Aside ($200,000 each year).

The PWSLP also can offer a reduction to the amount of principal that an applicant would otherwise need to repay for its project. This reduction is called “principal forgiveness” per federal statue. Principal forgiveness functions much like a grant where the eligible capital costs of the project are reduced by the principal forgiveness amount, thereby eliminating a portion of the principal (and interest) that the borrower must repay. For State FY 2023 the Illinois EPA offered four types of principal forgiveness: Lead Service Line Replacement, Disadvantaged Community Principal Forgiveness, Small System Compliance Assistance Principal Forgiveness, and One Well Critical Review Principal Forgiveness.

Permit Requirements for Construction and Operation

Illinois has had a water supply permit program for many years, even prior to the creation of the Illinois EPA in 1970, under the Board of Health. Currently, the Illinois EPA issues construction and operating permits for CWS systems. Pursuant to 35 Ill. Adm. Code 602.200(a), a person must not cause or allow the construction of any new CWS installation, or cause or allow the change of or addition to any existing CWS, without a construction permit issued by the Illinois EPA. 35 Ill. Adm. Code 602.200(b) specifies changes that require a permit which include any alternations that may affect the sanitary quality, mineral quality or adequacy of CWS systems, adding new chemicals or points of application to the treatment process, and rehabilitating a water main using a liner.

The permit program allows Illinois EPA to ensure that adequate technical and managerial capacity is provided for new and improved community water systems. Existing systems must show that proposed improvements meet the requirements of 35 Ill. Adm. Code Part 604. This documentation includes confirmation of back-up power, adequate capacity to meet maximum daily demand, that finished water meets the requirements of 35 Ill. Adm. Code Part 611, and more. All new public water supplies must demonstrate technical, financial and managerial capacity to ensure compliance with drinking water standards pursuant to 35 Ill. Adm. Code 652.300. The documents in the capacity demonstration included, but are not limited to, personnel organizational charts, an operation management plan, and emergency management plan.

Source Water Protection Program

The Illinois EPA has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Illinois SWAP activities are divided into the following areas: community surface water supplies, non-community surface water supplies, community groundwater supplies, Lake Michigan supplies, non-community groundwater supplies, and mixed ground and surface water community water supplies. Assessments have been conducted for all public water supplies in Illinois, including approximately 1,800 community water supplies. In addition, more than 4,100 non-community water supplies have been assessed.

SWAPs will help communities make important decisions about how to protect their drinking water by working to ensure safe drinking water supplies, the health and economy of the community, as well as the preservation of natural resources. In addition, investments in drinking water treatment will be sustained for a longer period of time. In August of 2019, 35 Ill. Adm. Code Part 604 of the Board regulations required each CWS system that treats surface or groundwater as a primary or emergency supply of water to develop source water protection plans (SWPP) that must be approved by the Illinois EPA.

Last year, 27 SWPPs for large CWS systems (with populations >50,000) were submitted to the Illinois EPA. The due date for submitting plans for medium CWS systems (with populations between 3,000 and 50,000) was July 25, 2023. The Illinois EPA has received 208 plans from medium systems. Information on SWPP submittals for small CWS systems (with populations <5,000) will be provided next year. The SWPPs will be reviewed to ensure the system has conducted an internal evaluation of their water source(s) and measures are in place to protect each system's water resources.

Monitoring Requirements

By requiring CWS systems to have a monitoring schedule the Illinois EPA can evaluate whether or not CWS systems are collecting samples at the locations and frequencies required by 35 Ill. Adm. Code Part 611. If systems receive monitoring violations this is an indicator that the system may not have adequate managerial, financial or technical capacity to comply with 35 Ill. Adm. Code Part 611. In Illinois, CWS systems are notified of their sampling requirements through sample demand letters. Sample demand letters are sent prior to the start of a monitoring period.

If a new monitoring schedule or a change to a current monitoring schedule is made, the CWS is sent a letter from the compliance officer notifying them of the changes. Monitoring schedules are available to operators through drinking water watch (DWW). Operators are aware that they can view their monitoring schedules in DWW. DWW reflects the most recent monitoring requirements and should be used to confirm monitoring is completed during the correct period.

For lead and copper monitoring changes, the Illinois EPA has a site plan change request form available on our website. CWS systems can request to add, permanently remove, activate, inactivate, and change site information for any of their sites using this form. The owner or operator of each CWS system must develop a material inventory and submit annually by April 15th each year to the Illinois EPA. Responsible Operators in Charge are reminded each year by email notifying them of the upcoming due date to submit their inventory.

Operator Certification Program

The Illinois EPA operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of CWS systems in order to assure that the water is safe for ordinary domestic consumption and that existing CWS systems are maintaining adequate technical and managerial capacity. The operators must also maintain proper operation of drinking water treatment systems. In State FY 2023, Illinois had 2452 fully certified CWS operators, not including operators that expired in 2022. There were 100 new operators certified in State FY 2023. An operator certified as competent by the Illinois EPA must be able to perform duties without endangering public health.

In order to determine competency, the Illinois EPA must evaluate whether applicants for operator certification possess the necessary skills, knowledge, ability and judgment to properly operate and maintain the facilities. Therefore, applicants for certification must meet specific experience, education, and examination requirements to qualify for full certification.

To help ensure that certified drinking water operators' knowledge stays current, certified operators are also required to meet continuing education requirements to renew their certification. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third may be comprised of technical or non-technical/professional courses such as safety or management. In 2020, an increase in virtual and correspondence-type operator training courses became available due to the in-ability to meet in-person. The Illinois EPA approves operator renewal training credit for virtual courses that meet the requirements in 35 Ill. Adm. Code 681.820.

Cross-Connection Control

Illinois requires all public water supplies to have an active, enforceable cross-connection control program in place, and to maintain records to document that cross-connection control is being practiced throughout the public water supply distribution system. Industries or facilities installing or possessing backflow prevention devices must have those devices inspected and tested at the time of installation and at least annually thereafter to ensure continued proper operation.

Verification of inspection must be submitted to public water supply officials, who must ensure that appropriate inspection and maintenance of all cross-connection control devices has been performed. If a CWS system does not have a cross connection control program or does not provide verification of device inspections as required by 35 Ill. Adm. Code Part 604, these significant deficiencies are included in Notice of Significant Deficiencies letters and must be

addressed. If the CWS system does not address these items, then enforcement will occur. Field staff review requirements with operators during inspections and inform systems of what would bring them into compliance.

The cross-connection control device inspector approval program is coordinated by the field operation staff as a basic element of the water supply program. Registration and instruction are primarily conducted by the Environmental Resources Training Center, Edwardsville. The TMF pre-screening survey also verifies whether the system is currently implementing a cross-connection control program.

Technical Assistance

Illinois EPA regional offices regularly provide technical assistance to CWS systems through conversations conducted during sanitary surveys as well as answering questions received over the phone from CWS systems throughout the year. Recently Illinois EPA field staff provided technical assistance to a CWS system that received a violation for failure to submit monthly operating reports. The system is now submitting complete reports to the Illinois EPA on time. Another example of technical assistance provided by field staff was for a CWS system struggling to obtain a certified operator. Field staff worked with the system to get an approved contract for a certified operator and worked with the new operator to develop an approvable nitrification action plan. The Illinois EPA has taken steps to have field operations staff clearly document the type of technical assistance provided during inspections. Illinois EPA field staff routinely advise CWS systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to help with.

Asset Management

Illinois encourages the development of asset management plans through a multiple path approach that involves the Drinking Water State Revolving Fund (DWSRF) program, operator training and the sanitary survey process. Illinois encourages public water systems to develop asset management plans by assigning priority points to drinking water state revolving fund loan applicants that are either developing or currently implementing an asset management plan pursuant to 35 Ill. Adm. Code 662.345(g).

Illinois EPA and IDPH are working with Great Lakes Rural Community Assistance Program (RCAP) by utilizing USEPA grant money to provide asset management training and technical assistance to systems interested in developing asset management plans. RCAP is currently working with 5 systems (3 CWS and 2 NCWS systems) to write asset management plans.

An asset management section was added to the recently updated TMF pre-screening survey that is currently implemented in Illinois EPA's engineering evaluations as discussed in Section 3.1.1 above. Illinois EPA drinking water FOS staff received training via the USEPA's TMF and asset management training modules. The Illinois EPA added language to field office non-compliance advisory letters recommending that systems without an asset management develop one. Systems with asset management plans that do not meet all elements of the five-core question framework will receive a recommendation to update their plan. The

recommendation also directs systems to the Illinois EPA's recently developed webpage on asset management. The webpage explains the basics of asset management and allows users to click on links to further asset management guidance documents created by USEPA and the Environmental Finance Center. In the future, the Illinois EPA plans to explore the possibility of requiring asset management plans for DWSRF loan applicants as well as for systems applying for a construction permit to increase capacity by greater than 20%.

Climate Change Adaptation

The Illinois EPA understands the importance of ensuring CWS systems implement climate change adaptation measures to prepare and adjust to both the current and projected impacts of climate change. The DWSRF program, pursuant to 35 Ill. Adm. Code 662.345, awards loan projects additional priority points if the project contains conservation and green infrastructure measures, specifically: projects that are based upon completion of a system-wide audit; projects with utility rates that promote water conservation; projects that utilize improved technologies and practices to reduce energy consumption or use energy in a more efficient way; projects that utilize renewable energy or that produce renewable energy; projects that contain resiliency components; and projects that implement green infrastructure.

The Illinois Administrative Code requires CWS systems to be constructed and have emergency operation plans to ensure climate change resiliency. Pursuant to 35 Ill. Adm. Code 604.135, CWS systems must develop an emergency operations plan. The emergency operation plan must include a review of the methods and means by which alternative supplies of drinking water could be provided in the event of destruction, impairment or contamination of the CWS system. The CWS system must review its emergency operations plan at least every three years and revise as necessary. Pursuant to 35 Ill. Adm. Code 604.110(b), all CWS facilities must be located outside the flood plain or must be at least two feet above the 100-year flood elevation or maximum flood of record. In addition to these requirements, electrical controls must not be subject to flooding and CWS systems must provide on-site, dedicated standby power capable of maintaining continued operation of its water system during power outages pursuant to 35 Ill. Adm. Code 604.155.

3.1.2 NCWS

The IDPH uses a combination of tools to assist existing NCWS systems in acquiring and maintaining TMF capacity. These tools include sanitary surveys, enforcement actions, permit requirements for construction, Source Water Protection Program, monitoring requirements, Operator Certification Program, and technical assistance.

This program is unique because these systems are not in the business of producing water for resale; therefore, the treatment and monitoring of the water system has not traditionally been a routine function of management. The water supply at these facilities is used for drinking, sanitation and, in some cases, manufacturing processes. Demonstrating capacity for these types of NCWS is, for the most part, a small part of the overall management, budget, and operating plan for these facilities.

Since 2020, IDPH has dramatically increased pre-enforcement, formal enforcement, and cross program initiatives to achieve compliance at NCWS. These activities are resulting in many inquiries from NCWS owners and managers. IDPH is then able to help educate these managers on the importance of safe drinking water as a critical component of their operations.

IDPH uses existing field survey and visit information in addition to enforcement data to identify NCWS which need or may benefit from capacity development assistance. Central Office staff coordinates the dissemination of information and education of NCWS personnel for all new or amended regulations and requirements. When on-site capacity assistance is required, Central Office staff coordinate with Regional Office or Local Health Department staff to provide training or technical assistance.

Sanitary Surveys

Sanitary surveys are performed every 2 years at all active, non-licensed NCWS systems and on an annual basis at all active, licensed systems (i.e. campgrounds, youth camps, bathing beaches, swimming pools, migrant labor camps). The sanitary survey includes a review of the eight elements of a sanitary survey: water source, pumps, distribution, storage, treatment, monitoring and reporting of analytical results/ data verification, management and operation, and operator compliance (non-transient systems). IDPH Regional Offices and Local Health Departments working for IDPH completed 1540 sanitary surveys in the 2023 State FY.

The results of the sanitary survey are documented on a sanitary survey/site inspection form. This form is used during the sanitary survey to provide the central office with a “hard” or “electronic” copy documenting that the survey has covered all the eight elements required under the federal regulations. An evaluation summary for each of the eight elements is indicated for all sanitary surveys. The evaluation summary indicates the element was evaluated and if significant deficiencies were noted under that element. This information is reported in SDWIS/State. Significant deficiencies are also listed in detailed description with required corrective action and a due date for completion. In addition, the sanitary survey/site inspection form indicates any changes that occurred since the last survey and provides a summary of coliform and nitrate samples since the last survey.

An inspection letter must be sent to the owner after the sanitary survey has been completed if significant deficiencies are noted. All significant deficiencies are cited with a time for correction. Any recommendations are also listed.

IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This procedure has taken some time to develop and should be completed by early Fall 2023. The new Sanitary Survey Procedure may also prove useful in providing data trends to track capacity concerns.

During the sanitary survey an update of inventory information is provided if this information has not been updated in SDWIS/State. This would include any new facility information (source,

storage, treatment, etc.) as well as updates to administrative contacts and certified operator information.

Enforcement Actions

The IDPH internal enforcement process escalates to ensure that notification is given to a water supplier found in violation, and that failure to correct the violation within a reasonable amount of time, results in formal enforcement action. IDPH developed a new enforcement Standard Operating Procedure (SOP) with implementation beginning in State FY 2023. This SOP sets up specific levels of enforcement based on violation type, number of violations and/or time in non-compliance status.

Actions or deficiencies that constitute violations subject to enforcement include, but are not limited to: monitoring violations, reporting violations, treatment technique violations, MCL violations, maximum residual disinfectant level violations, construction violations and lack of a certified operator. Reportable violations are tracked using a combination of SDWIS/State and an access database. When formal enforcement is triggered, it begins with a Notice of Violation (NOV) being sent to the water supplier. NOVs are tracked in the NCWS Program NOV Database. A list of NOVs and descriptions of the violations issued in State FY 2023 are shown in Table G of this report.

Permit Requirements for Construction

A permit to construct a new non-community public water system must be obtained from the IDPH prior to construction. In addition, a permit for any major alteration of, or extension to, a non-community public water system must be obtained from IDPH prior to construction. Major alterations include changes to source, treatment, storage, distribution, or system capacity. Upon completion of any construction for which a permit has been issued, the owner is required to notify IDPH. All applications for a permit to construct a non-transient, non-community public water system must contain information relative to its financial, managerial, and technical capability to meet all drinking water regulations.

Source Water Protection Program

IDPH has implemented a source water assessment program (SWAP) to assist with wellhead and watershed protection of public drinking water supplies. Assessments have been conducted at more than 4,100 non-community water supplies and continue to be conducted. All new wells and surface water supplies are evaluated as to their vulnerability to potential contamination.

Monitoring Requirements

In Illinois, NCWS systems are notified of their sampling requirements through schedule letters and during the sanitary survey process. Sample schedule letters are sent for coliform and nitrate monitoring requirements and for all non-transient chemical monitoring requirements. The notification by letter of coliform schedules was new in 2022 as this was previously provided during sanitary surveys only. All monitoring schedules are available in drinking water watch and can be accessed at all times.

Operator Certification Program

IDPH operates a Drinking Water Operator Certification Program that certifies the technical competency of operators of NTNCWS systems in order to ensure that drinking water systems are properly operated. In State FY 2023 Illinois had 385 fully certified NTNCWS operators. An operator certified as competent by IDPH must be able to perform duties without endangering public health. In order to be certified by IDPH, an operator must provide evidence of successful completion of a water operator's course that has been approved by the IDPH. In addition, IDPH accepts operators that have been certified by Illinois EPA as a public water supply operators. Certified operators shall be re-certified every three years. In order to be re-certified, the operator shall complete an on-line re-certification course or attend a re-certification training session approved by IDPH. Proof must then be provided of completion of the on-line course or attendance from the organization conducting the training session. New operator certification course and re-certification course providers both have provided virtual courses during the pandemic and will continue to have this ability as needed.

Technical Assistance

IDPH Regional Offices and Local Health Department offices working for IDPH regularly provide technical assistance to NCWS systems through conversations conducted during sanitary surveys as well as answering questions over the phone and e-mail received from NCWS systems throughout the year. The IDPH central office also answers questions and gives assistance over the phone to NCWS systems on a routine basis.

In addition, IDPH refers systems with well problems to licensed well contractors for wells experiencing contamination issues. On particularly difficult well contamination problems, central office staff accompanies inspectors in the field to explain regulations and offer solutions to NCWS owners and operators.

IDPH also refers water systems to RCAP and IRWA as the need and opportunity arise. At the June 12, 2022 IRWA 2023/2024 Operational Planning Meeting, IRWA committed to do technical visits at a group of NCWS with challenging compliance issues in State Fiscal Year 2024.

3.2 Identification of Systems in Need of Assistance

3.2.1 CWS

Illinois utilizes the various tools identified in Section 3.1.1 of this report to assist CWS systems in acquiring and maintaining TMF capacity. Illinois EPA keeps track of deficiencies found using some of these tools with a combination of the Critical Review List and the Master NOV Database. All enforcement actions are tracked using the Master NOV Database as mentioned previously. Table B lists all violations in the Master NOV Database for State FY 2023. The Illinois EPA continues to review the Master NOV Database and Critical Review List annually to identify common trends in CWS statewide capacity concerns.

Critical Review is defined in 35 Ill. Adm. Code 602.107 as the Illinois EPA's determination that a CWS exceeds 80 percent of the rate of any of the quantity requirements in the Board's or Illinois EPA's rules. Any CWS placed on the Critical Review/Restricted Status List is sent a notification letter. The Illinois EPA publishes a copy of this list on its website and updates regularly. The Board publishes the list in the Environmental Register. A copy of the most updated Critical Review List as of August 2023 can be found in Table C of this report.

The Illinois EPA has begun to train field staff to utilize SDWIS to track CWS inspection deficiencies as discussed in Section 3.1.1 of this report under Engineering Evaluations. In the future, the Illinois EPA plans to use the data in SDWIS to track capacity concerns and compare to baseline data to determine trends.

3.2.2 NCWS

IDPH utilizes the various tools identified in Section 3.1.2 of this report to assist NCWS systems in acquiring and maintaining TMF capacity. IDPH keeps track of violations cited and reported using SDWIS/State and develops reports and spreadsheets with the various violation types listed. All violations and enforcement actions are tracked using SDWIS/State and IDPH is able to query the data with an interactive Access database.

IDPH developed a new enforcement standard operating procedure (SOP) and began implementing this SOP last fiscal year. This SOP allows IDPH to identify systems with the highest priority of non-compliance. Another tool IDPH has developed is the NOV report, Table G. This report identifies all NOVs issued and the violations cited in the Notice. Those NOVs that are still open are candidates for critical need of assistance. Table H details the number of the violation types that are included in the NOVs.

IDPH will begin an annual review of the information in the NOV report (violation types and totals) to identify statewide trends and capacity concerns. This initial listing will be used as a baseline. This initial baseline shows the areas with the most violations are nitrate monitoring and reporting, seasonal startup followed by lack of a certified operator and coliform monitoring and reporting.

3.3 Assistance Approach

3.3.1 CWS

As discussed previously, Illinois EPA field staff provide technical assistance to systems with violations or deficiencies found during site inspections. In addition these technical assistance efforts, Illinois EPA also advises water systems to contact IRWA for deficiencies noted during sanitary surveys that field staff are unable to assist with.

From August 1, 2022 through July 31, 2023, IRWA held 17 cost-free training programs attended by 501 water supply officials representing 292 different water systems. The formal training programs focused on the lead and copper rule requirements, operation and maintenance, state rules and regulations and sanitary surveys. IRWA spent over 382 hours conducting one-on-one

technical assistance with water supply officials. In excess of 90 hours of this time was with systems considered "overburdened". IRWA specialists placed emphasis on assisting community water supplies with the DWSRF program and compliance activities. Twenty hours were spent on emergency planning and requests for "emergency" assistance. Five on-site technical assistance efforts resulted in the development of written case studies that document the needs of respective systems.

The Illinois EPA sorted data from the Master NOV Database for State FY 2023 (Table B) and data from the August 2023 Critical Review List (Table C) and included the data in Table E. Table D is considered the baseline data for CWS for Illinois. By far, the highest number of deficiencies for State FY 2023 in Table E was for systems with only one well. The number of systems with only one well increased slightly from last year most likely due to further investigative efforts. The Illinois EPA plans to reduce the number of systems with one well by offering principal forgiveness to systems to obtain a second water source. The loan requires applicants to justify source alternatives. By requiring systems to provide the alternative justification the Illinois EPA hopes to encourage systems to consider consolidation.

Other categories in Table E that show a significant increase in capacity issues are managerial capacity, monthly operating report submissions, cross connection control, emergency operation plans, and missing permits. These significant increases are due to the Agency pursuing enforcement actions at correctional facilities across the states. The Illinois EPA conducted sanitary surveys at correctional facilities operating CWS systems that had not recently been inspected. The Illinois EPA issued Violations Notices for violations of the Safe Drinking Water Act and Illinois Environmental Protection Act and accompanying regulations to thirty correctional facilities operating CWS systems within the facilities over the course of the past year and anticipates entering into Compliance Commitment Agreements with each facility by the end of the federal fiscal year. The Illinois EPA attributes the large increase in the number of violations listed to the correctional facility inspections and believes violation numbers will be closer to the baseline data for next fiscal year. Some of the other categories in Table E were combined and new categories were added for nitrification action plans, flushing programs, and other technical deficiencies.

The Illinois EPA plans to explore the possibility of increasing the amount of Drinking Water State Revolving Fund set-asides to provide technical assistance to public water supplies and provide funding to IDPH to support technical assistance for non-community water systems.

3.3.2 NCWS

IDPH will continue to provide technical assistance during sanitary surveys and through phone and e-mail contact with NCWS Systems. Phone and e-mail contact is made frequently with systems cited for deficiencies, violations of drinking water rules and having difficulties meeting drinking water contaminant standards. The IDPH Division of Environmental Health has a Monthly Activity Report (MARS) which documents assistance telephone calls/e-mails with IDPH regulated entities from both Central Office and Regional Office Staff. IDPH will pursue using

this as a tool to provide an output of Capacity Development Program activities for providing technical assistance to NCWS from both IDPH Central Office and IDPH Regional Offices.

IDPH did not utilize RCAP or IRWA for on-site assistance in this reporting period. However, IDPH obtained a commitment at the June 12, 2023 IRWA 2023/2024 operational planning meeting for technical assistance visits to two schools with difficult compliance treatment issues and the 8 surface water systems that also have challenging compliance issues. IDPH is hopeful these visits will be fruitful and will continue to look for opportunities to refer NCWS systems with these difficult compliance issues to RCAP or IRWA for on-site assistance.

The American Camp Association – Illinois, an IDPH stakeholder, requested IDPH to participate in a member virtual meeting last reporting period (2021/2022) to provide an overview of regulatory requirements for campgrounds and youth camps classified as NCWS. A meeting was not scheduled this reporting period, but IDPH will look to renew this meeting in the 2023/2024 reporting period.

IDPH continues to coordinate across programs to encourage compliance with drinking water regulations. In the 2022/2023 reporting period, campgrounds and youth camps were again not issued operating license renewals if they operated a NCWS in non-compliance status. This has been helpful in returning many systems to compliance for violations of the drinking water regulations. It has also been helpful to educate many campground and youth camp NCWS owners and managers on drinking water regulations and capacity issues. The IDPH licensing program renewal notice forewarns campgrounds and youth camps that are NCWS systems that water system non-compliance will hold up their camp renewal. This provokes many NCWS owners and managers to find out what is needed to remain in compliance.

Three NCWS participated in a pilot project to develop Asset Management Plans with RCAP and EFC in summer and fall of 2022. Two of these systems were Constellation Energy Systems an IDPH Stakeholder. RCAP and EFC worked directly with these NCWS to do an Asset Management Review of these systems which included the five-core question framework and produce an Asset Management Plan with recommendations for the NCWS to implement.

On March 28 through March 30, 2023, EFC offered a free on-line training course for Asset Management to small water systems in Illinois. IDPH promoted this training and offered continuing education credit to NCWS certified operators. This effort proved successful as nearly 40 IDH certified operators attended this training session. The training was well received by the operators and was very informative and comprehensive on the benefits of Asset Management.

The Illinois Capacity Development strategy requires IDPH to work to add an asset management section to the sanitary survey checklist. If the TMF pre-screening survey finds that the public water system does not have an asset management plan that incorporates all components of the five-core-question framework, then a recommendation will be added to the sanitary survey inspection letter advising the public water system to address this deficiency. IDPH has been

delayed in implementing this component of the strategy for a couple reasons. First, as noted in 3.1.2, IDPH is implementing a new Sanitary Survey Procedure that will help identify, track, and report Significant Deficiencies and required corrective actions in SDWIS/State. This procedure has taken some time and effort to develop, delaying work on the TMF pre-screening checklist. Second, IDPH has had difficulty finding TMF pre-screening checklists applicable to NCWS. IDPH will continue to work on adding this procedure of the strategy in State Fiscal Year 2024.

3.4 Implementation Review

3.4.1 CWS

The Illinois EPA has conducted a review of the existing system implementation strategy and found numerous areas that may be improved upon. These areas include, but are not limited to, continuing to provide training to field staff on how to utilize SDWIS to track deficiencies noted during site-inspections, documenting technical assistance activities, exploring the possible use of additional set-asides to fund technical assistance efforts, and exploring the possibility of requiring CWS systems to develop asset management plans.

3.4.2 NCWS

The IDPH has conducted a review of implementation of the existing system strategy and found some areas that may be improved upon. These areas include but are not limited to the following: continuing to look for more opportunities to utilize RCAP or IRWA for on-site assistance; continuing to look for viable options to provide financial planning assistance for NCWS systems including a pre-screening sanitary survey checklist that incorporates the 5-core-question framework; and continuing to incorporate stakeholder involvement. In addition, IDPH will pursue, using it's MARS Report as a tool, providing an output of Capacity Development Program activities and technical assistance. When these items are implemented, the existing capacity development strategy will be updated.

3.5 Modifications to Existing Strategy

3.5.1 CWS

Illinois did make modifications to the existing CWS strategy in State FY 2023. These modifications include updating the TMF pre-screening survey, adding an asset management plan recommendation to FOS non-compliance letters, using SDWIS to track inspection deficiencies, documenting technical assistance efforts in the field, and adding a section on asset management and climate change adaptation to this report.

3.5.2 NCWS

Illinois has added the NOV report which details NOVs issued and violations cited in Table G. Table H details the violation types and numbers that caused NOVs to be issued. In addition, IDPH is implementing a new Sanitary Survey SOP that will help identify, track, and report significant deficiencies and required corrective actions in SDWIS\State. This SOP will be effective by September 30, 2023.

4.0 Tables

TABLE A

New CWS Systems State FY 2021 Through State FY 2023

System ID	System Name	Activity Status	Activity Date	Capacity Demonstration Notes/Approval Dates	ETT Score >11
IL0150030	Thomson Maximum Security Center	Active	6/8/2023	Existing facility, no new infrastructure built	No
IL0815110	Rolling Meadows MHP (Jefferson CO)	Active	4/17/2023	Existing facility, no new infrastructure built	No
IL1635055	Arapaho Village MHP	Active	4/5/2023	Existing facility, no new infrastructure built	No
IL1990560	Marion Mobile Home Village	Active	3/24/2023	Existing facility, No new infrastructure built	No
IL1795030	UAW Senior Citizens Center	Active	3/24/2023	Existing facility, no new infrastructure built	No
IL0430055	Aqua Illinois – Oak Brook	Pending	3/16/2023	Existing facility, no new infrastructure built	No
IL1934000	W2E Water Coop	Pending	2/28/2023	New CWS, capacity demonstration needs to be submitted	No
IL1010010	Lawrence County Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL0210010	Taylorville Correctional Center	Active	2/6/2023	Existing facility, no new infrastructure built	No
IL1670200	Cottonwood Cove MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL1670225	Forrest Park MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0317010	Harbor Point Estates MHP	Active	1/1/2023	Existing facility, no new infrastructure built	No
IL0971540	Cambridge Courts MHP	Active	9/30/2022	Existing facility, no new infrastructure built	No

IL1670260	United Regional Water Coop	Active	9/1/2022	New CWS, Capacity Demonstration Approved 11/6/2020	No
IL1970460	Joliet Inpatient Treatment Center	Active	8/30/2022	Existing facility, no new infrastructure built	No
IL1815500	Choate MHC	Active	6/21/2022	Existing facility, no new infrastructure built	No
IL1115125	Oakbrook Estates MHP	Active	5/11/2022	Existing facility, no new infrastructure built	No
IL0978970	LCPW – Oak Terrace	Active	5/4/2022	Existing facility, no new infrastructure built	No
IL0075185	Four Seasons MHP	Active	4/6/2022	Existing facility, no new infrastructure built	No
IL1631150	Valley View Estates	Active	2/18/2022	Existing facility, no new infrastructure built	No
IL1590220	Acorn Acres MHP	Active	11/9/2021	Existing facility, no new infrastructure built	No
IL1635000	Cahokia Heights	Active	8/6/2021	Existing facility, no new infrastructure built	No
IL0810200	Oak Grove Village	Active	7/12/2021	Existing facility, no new infrastructure built	No
IL1635060	Meadowbrook MH Community, LLC	Active	3/23/2021	Existing facility, no new infrastructure built	No
IL0890080	Recovery Centers of America	Active	11/24/2020	Existing facility, no new infrastructure built	No
IL0971700	Brookdale Senior Living – Vernon Hills	Active	11/18/2020	Existing facility, no new infrastructure built	No
IL0830020	IL Alluvial Regional Water Company	Pending	11/2/2020	New CWS, Capacity Demonstration Approved 12/23/2022	No
IL1150160	Decatur MHP, LLC	Active	7/8/2020	Existing facility, no new infrastructure built	No

TABLE B

CWS State FY 2023 Violations Issued *

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
ABINGDON	IL0950050	W-2022-00067	FAILURE TO PREPARE, DISTRIBUTE 2022 CCR WITH ALL REQUIRED CCR ELEMENTS	12/8/2022
ALMA	IL1210050	W-2022-00069	FAILURE TO DISTRIBUTE CCR ACCORDING TO MOD WITH ALL ELEMENTS AND FAILURE TO COLLECT BACTI SAMPLE	12/7/2022
AQUA ILLINOIS-OAK RUN	IL0955200	W-2023-00001	CHLORINE FEED RATE IS ABOVE MAXIUM DOSAGE RATE	1/17/2023
BARDOLPH	IL1090050	W-2023-00015	EXCEEDANCE OF LRAA MCL FOR TTHM	2/15/2023
BEECHER CITY	IL0490100	W-2023-00021	EXCEEDANCE OF LRAA MCL FOR TTHM'S AND HAA5'S	4/14/2023
BETHALTO	IL1190150	W-2022-00061	FAILURE TO MONITOR ANNUAL DBP'S DURING THE PEAK HISTORICAL MONTH	11/18/2022
BIG MUDDY RIVER CORRECTIONAL CENTER	IL0810020	W-2023-00030	MULTIPLE FOS VIOLATIONS	5/3/2023
BISHOP HILL	IL0730250	W-2023-00002	MISSING OPERATING AND CONSTRUCTION PERMITS	1/18/2023
BOWEN	IL0670200	W-2022-00045	Failed to maintain WQP Ranges	10/3/2022
BROWNSTOWN	IL0510100	W-2023-00022	EXCEEDANCE OF LRAA MCL OR TTHM; FAILURE TO MONITOR COLIFORM/CHLORINE RESIDUAL	3/17/2023
BUCKLEY	IL0750150	W-2023-00036	FAILURE TO OBTAIN A CONSTRUCTION PERMIT FOR A WATERMAIN EXTENSION	5/31/2023
CAMP POINT	IL0010050	W-2022-00044	FAILURE TO MAINTAIN WQP RANGES	10/3/2022
CENTRALIA CORRECTIONAL SITE	IL0275600	W-2023-00032	MULTIPLE VIOLATIONS FROM FOS	4/18/2023
CHENOA	IL1130300	W-2023-00014	EXCEDANCE OF LRAA MCL FOR TTHM	2/15/2023
CHRISMAN	IL0450100	W-2022-00066	FAILURE TO SUBMIT OCCT RECOMMENDATION, LEAD CONSUMER NOTICE AND PUBLIC EDUCATION	11/29/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
CISCO	IL1470150	W-2023-00016	FAILURE TO RECOMMEND THE INSTALLATION AND OPERATION OF SOURCE WATER TREATMENT	6/16/2023
Clayton Work Camp	IL0010150	W-2023-00025	MULTIPLE VIOLATIONS FROM FOS	3/31/2023
CLAYTON-CAMP-POINT WATER COMMISSION	IL0015200	W-2022-00056	FAILURE TO PROPERLY FEED ORTHOPHOSPHATE AT CALCULATED DOSAGE RATE OF 2.5 MG/L OR GREATER	10/5/2022
CUTLER	IL1450050	W-2022-00047	VIOLATIONS FROM FOS	9/7/2022
DANVILLE CORRECTIONAL CENTER	IL1835400	W-2023-00034	MISC FROM FOS	4/21/2023
DECATUR CORRECTIONAL CENTER	IL1150140	W-2023-00009	FAILURE TO HAVE A NAP, CC PROGRAM, EMERGENCY OPERATIONS PLAN, FLUSHING PROGRAM AND TO SUBMIT MORS	2/6/2023
DES PLAINES MHP	IL0317775	W-2022-00048	EXCEEDING THE GROSS ALPHA MCL AT TP01	8/26/2022
DIXON CORRECTIONAL CENTER	IL1035500	W-2023-00038	MULTIPLE FOS VIOLATIONS	5/16/2023
EAST DUNDEE	IL0890250	W-2022-00060	FAILURE TO SUBMIT MONTHLY OPERATING REPORTS	12/27/2022
EAST MOLINE CORRECTIONAL CENTER	IL1617120	W-2023-00042	MISC FROM FOS	5/19/2023
EDINBURG	IL0210150	W-2022-00071	EXCEEDANCE OF LRAA MCL FOR TTHM	1/4/2023
FORD HEIGHTS	IL0310720	W-2022-00065	FOS VIOLATIONS	12/14/2022
FRANKLIN GROVE	IL1030250	W-2023-00003	LACK OF CERTIFIED OPERATOR	1/27/2023
GRAHAM CORRECTIONAL SITE	IL1355100	W-2023-00020	MULTIPLE SIGNIFICANT DEFICIENCIES FROM FOS	2/21/2023
HILL CORRECTIONAL CENTER	IL0950010	W-2023-00033	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/18/2023
HILLTOP MHP	IL1130080	W-2022-00068	FAILURE TO PREPARE AND DISTRIBUTE ALL REQUIRED CCR ELEMENTS	12/13/2022
IL RIVER CORRECTIONAL CENTER	IL0570020	W-2023-00026	MISC FROM FOS	3/31/2023
JACKSONVILLE CORRECTIONAL CENTER	IL1375200	W-2023-00023	MULTIPLE FOS VN	3/31/2023
JASPER WATERWORKS CORPORATION	IL1910020	W-2022-00058	FAILURE TO MAINTAIN A MINIMUM COMBINED CHLORINE RESIDUAL OF 1.0 MG/L IN ALL PARTS OF DISTRIBUTION.	10/19/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
JOLIET INPATIENT TREATMENT CENTER	IL1970460	W-2023-00010	LACK OF CROSS CONNECTION CONTROL PROGRAM, MISSING MONTHLY OPERATING REPORTS, NO BACTERIOLOGICAL PLAN	2/10/2023
KEWANEE LSRC	IL0730650	W-2023-00044	MISC FROM FOS	5/19/2023
LAWRENCE COUNTY CORRECTIONAL CENTER	IL1010010	W-2023-00011	MULTI FOS VN	2/7/2023
LEROY	IL1130750	W-2023-00041	EXCEEDANCE OF LRAA MCL FOR HAA5/FAILURE TO PROVIE PUBLIC EDUCATION	6/2/2023
LINCOLN CORRECTIONAL CENTER	IL1075450	W-2023-00029	FOS INSPECTION VIOLATIONS	4/21/2023
LOGAN CORRECTIONAL CENTER	IL1075520	W-2023-00013	MULTIPLE VIOLATIONS FROM FOS	2/14/2023
MARENGO	IL1110650	W-2022-00042	FAILURE TO PROVIDE SAFE SOURCE OF WATER, FAILURE TO FULFILL CONDITIONS OF SEP	8/24/2022
MENARD CORRECTIONAL CENTER	IL1575550	W-2023-00039	MULTIPLE VIOLATIONS FROM FOS	5/15/2023
MOKENA	IL1970600	W-2022-00055	FAILURE TO COMPLETE CROSS CONNECTION SURVEY	12/14/2022
MULBERRY GROVE	IL0050100	W-2022-00046	HAA5 MCL EXCEEDANCE	8/26/2022
MUNDELEIN	IL0971150	W-2022-00050	FAILURE TO COMPLETE TRENNIAL CROSS-CONNECTION SURVEYS	8/30/2022
MURDALE PWD	IL1910020	W-2022-00059	FAILURE TO PROVIDE 10' OF HORIZONTAL SEPARATION AND FAILURE TO OBTAIN SUPPLEMENTAL APPROVAL	12/27/2022
MURPHYSBORO LSRC	IL0770500	W-2023-00040	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	4/28/2023
NEW PIASA CHAUTAUQUA PWS	IL0830010	W-2023-00004	FAILURE TO SUBMIT AN OPERATOR CONTRACT	1/24/2023
NICOR GAS, TROY GROVE STATION, NORTH STRUCTURE	6370	W-2023-00027	GROUNDWATER QUALITY STANDARDS EXCEEDANCES	3/21/2023
NOBLE	IL1590150	W-2022-00039	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
NORTH CHICAGO	IL0971250	W-2023-00046	EXCEEDANCE OF LRAA MCL FOR TTHM	6/13/2023
NORTHMEADOW VILLAGE MHP	IL1130060	W-2022-00057	FAILURE TO PREPARE AND DISTRIBUTE A 2022 CCR THAT INCLUDES ALL REQURIED CCR ELEMENTS	10/3/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
PINCKNEYVILLE CORRECTIONAL CENTER	IL1450010	W-2023-00024	MULTIPLE FOS VN	4/21/2023
Pittsfield WC	IL1490760	W-2023-00028	MISC FROM FOS	4/18/2023
PONTIll. Adm. Code CORRECTIONAL CENTER	IL1055500	W-2023-00008	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/6/2023
POSEN	IL0312520	W-2022-00051	FAILURE TO CONDUCT TRIENNIAL CROSS-CONNECTION SURVEY AND ANNUAL BACKLOW DEVICE TESTING	8/30/2022
RAMSEY	IL0510200	W-2023-00035	EXCEEDANCE OF LRAA MCL FOR HAA5	5/10/2023
ROBINSON CORRECTIONAL CENTER	IL0330010	W-2023-00007	FOS VIOLATIONS FROM INSPECTION	2/6/2023
ROCKDALE	IL1970850	W-2022-00062	FAILURE TO SAMPLE QUARTERLY FOR LEAD SEQUENTIAL PROFILING	11/28/2022
SAYBROOK	IL1130950	W-2023-00017	FAILURE TO OBTAIN CONSTRUCTION PERMIT AND OPERATING PERMIT FOR NEW ELEVATED TANK	3/9/2023
SHAWNEE CRCTL CNTR	IL0870010	W-2023-00019	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	2/14/2023
SHERIDAN CRCTL CNTR	IL0995840	W-2022-00072	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/27/2022
SOUTH JACKSONVILLE	IL1370400	W-2022-00043	FAILURE TO PROVIDE SAFE SOURCE OF RAW WATER	8/25/2022
SOUTHWESTERN IL CORRECTIONAL CENTER	IL1630030	W-2023-00037	MISC FROM FOS FOR DOC FACILITY	5/3/2023
ST ROSE PWD	IL0275250	W-2022-00063	FAILURE TO SEPARATE WATER WITH A FREE CHLORINE RESIDUAL FROM WATER WITH COMBINED.	11/28/2022
STATEVILLE CORRECTIONAL CENTER		W-2022-00073	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	1/9/2023
SUGAR GROVE	IL0890850	W-2023-00045	EXCEEDANCE OF MANGANESE STATE ONLY MCL AT TP01	5/15/2023
TAYLORVILLE CORRECTIONAL CENTER	IL0210010	W-2023-00012	MULTIPLE VN FROM FOS	2/21/2023
VANDALIA CORRECTIONAL CENTER	IL0510350	W-2023-00043	MISC FROM FOS	5/19/2023
VIENNA	IL0875510	W-2022-00070	MULTIPLE VIOLATIONS RESULTING FROM FOS INSPECTION	12/13/2022

Facility Name	Facility ID Number	VN Number	VN Description	VN Issued
WADSWORTH OAKS SUBDIVISION	IL0977320	W-2023-00005	FAILURE TO COMPLETE PREVIOUSLY NOTED ON-GOING VIOLATIONS	1/18/2023
WAUKEGAN	IL0971900	W-2022-00041	FAILURE TO COMPLETE A CORROSION CONTROL STUDY	8/4/2022
WEST LIBERTY-DUNDAS WATER DISTRICT	IL1595050	W-2022-00040	EXCEEDANCE OF LRAA MCL FOR TTHM	7/13/2022
WESTERN IL CORRECTIONAL CENTER	IL0090010	W-2023-00018	MULTIPLE VIOLATIONS FROM FOS	2/27/2023
WESTERN SPRINGS	IL0313180	W-2022-00064	FAILURE TO SUBMIT CCR ELEMENTS AND FAILURE TO SUBMIT MORS	12/13/2022
WILDWOOD MHP	IL0775410	W-2023-00006	LACK OF AN APPROVED OPERATOR CONRACT	4/27/2023
WILLOW CREEK NORTH MHP	IL1135130	W-2022-00054	LACK OF A CERTIFIED OPERATOR	11/10/2022

*If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table E

TABLE C

Illinois EPA DPWS Critical Review List August 2023

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
AIR VIEW MHP	IL1615185	1	NO BACKUP SOURCE	164	8/7/2020
ANCHOR	IL1130050	4	ONLY ONE WELL	155	8/28/2020
AQUA ILLINOIS - HIGHLAND ESTATES	IL0915220	2	ONLY ONE WELL	171	1/13/2021
AQUA ILLINOIS - INDIANOLA	IL1830500	4	ONLY ONE WELL	224	12/11/2020
AQUA ILLINOIS - SKYLINE	IL0915450	2	ONLY ONE WELL	208	1/8/2021
AQUA ILLINOIS - SUN RIVER TERRACE	IL0910720	2	ONLY ONE WELL	495	1/13/2021
BEAVER CREEK VILLAGE MHP	IL0755125	4	ONLY ONE WELL	48	1/6/2021
BROWNING	IL1690050	5	ONLY ONE WELL	175	12/2/2020
BUFFALO HOLLOW FARMS WATER ASSOCIATION	IL1430080	5	ONLY ONE WELL	45	7/22/2020
BUSY BEE MHP #1	IL1975195	2	ONLY ONE WELL	25	12/4/2020
CAMP GROVE	IL1235100	1	ONLY ONE WELL	75	6/24/2020
CANTON	IL0570250	5	INADEQUATE TREATMENT CAPACITY	13932	3/15/2007
CAPRON MHP	IL0075105	1	ONLY ONE WELL	98	1/27/2021
CARBON HILL	IL0630100	2	INADEQUATE TREATMENT CAPACITY	392	12/14/2016
CARROLL HEIGHTS UTILITIES COMPANY	IL0155200	1	ONLY ONE WELL	80	1/27/2021
CARTHAGE*	IL0670250	5	ONLY ONE WELL	2605	4/11/2023
CEDAR BROOK ESTATES SUBDIVISION	IL1615170	1	ONLY ONE WELL	200	8/7/2020
CEDAR POINT WATER COMPANY	IL0995040	1	ONLY ONE WELL	300	8/26/2020
CEDAR WATER COMPANY, INC.	IL0955150	5	ONLY ONE WELL	160	1/13/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
CENTURY PINES APARTMENTS	IL0150020	1	ONLY ONE WELL	25	1/27/2021
CHAIN-O-LAKES MHP	IL0975165	2	ONLY ONE WELL	81	8/28/2020
CHERRYDALE SUBDIVISION	IL1615120	1	ONLY ONE WELL	80	8/5/2020
CHIGAKWA PARK ESTATES	IL1615140	1	ONLY ONE WELL	53	8/7/2020
CLARKS MHP	IL2015425	1	ONLY ONE WELL	80	12/4/2020
COAL CITY	IL0630200	2	INADEQUATE TREATMENT CAPACITY	5587	12/14/2016
COLONIAL MEADOWS	IL1135100	6	ONLY ONE WELL	190	9/26/2020
COUNTRY LANE MHP	IL1135385	4	ONLY ONE WELL	35	6/24/2020
COUNTRY VIEW ESTATES MHP	IL0195625	4	ONLY ONE WELL	97	1/27/2021
COUNTRY VIEW ESTATES SUBDIVISION	IL1415220	1	ONLY ONE WELL	120	7/15/2020
DE WITT	IL0390100	4	ONLY ONE WELL	200	1/27/2021
DIXIE ESTATES SUBDIVISION	IL1975520	2	ONLY ONE WELL	180	12/9/2020
DONNY BROOK ESTATES	IL0375150	1	ONLY ONE WELL	30	1/27/2021
DONOVAN	IL0750400	4	ONLY ONE WELL	306	1/6/2021
EAST END WATER ASSOCIATION	IL1610140	1	ONLY ONE WELL	40	7/31/2020
EAST LAWN WATER ASSOCIATION	IL1615100	1	ONLY ONE WELL	160	8/5/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020
EAST LYNN COMMUNITY WATER SYSTEM	IL1835200	4	ONLY ONE WELL	112	12/11/2020
EAST SIDE MHP	IL0195825	4	ONLY ONE WELL	95	1/27/2021
EBERTS 3RD ADDITION	IL1615330	1	ONLY ONE WELL	99	8/12/2020
EDELSTEIN WATER COOPERATIVE	IL1435150	5	ONLY ONE WELL	125	7/24/2020
EHLERS MHP	IL0195645	4	ONLY ONE WELL	112	1/27/2021
ELM OAK MUTUAL WATER SYSTEM	IL0975736	2	ONLY ONE WELL	50	8/28/2020
ESQUIRE ESTATES MHP	IL1435245	5	ONLY ONE WELL	28	7/29/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
EVERGREEN VILLAGE SUBDIVISION	IL1615310	1	ONLY ONE WELL	130	8/12/2020
FOUR STAR CAMPGROUND	IL0990060	1	ONLY ONE WELL	150	8/26/2020
FOX CREEK FARMS WATER COMPANY	IL1435750	5	ONLY ONE WELL	221	7/29/2020
FOX LAWN HOMEOWNERS WATER ASSOCIATION	IL0935150	2	ONLY ONE WELL	167	1/13/2021
FRENTRESS LAKE	IL0850010	1	ONLY ONE WELL	150	1/8/2021
GARDEN STREET IMPROVEMENT ASSOCIATION	IL1975376	2	ONLY ONE WELL	54	12/9/2020
GREEN ACRES MHP	IL1035165	1	ONLY ONE WELL	200	8/26/2020
HARMON	IL1030300	1	ONLY ONE WELL	149	8/26/2020
HAZELWOOD 4TH ADDITION	IL0735350	1	ONLY ONE WELL	135	1/6/2021
HAZELWOOD WEST SUBDIVISION	IL0735250	1	ONLY ONE WELL	70	1/6/2021
HEATHERFIELD SUBDIVISION	IL0635150	2	ONLY ONE WELL	90	1/29/2021
HICKORY HILLS 2ND ADDITION WATER ASSOCIATION	IL0730080	1	ONLY ONE WELL	93	8/12/2020
HICKORY HILLS 2ND ADDITION*	IL1615450	1	ONLY ONE WELL	42	7/28/2023
HIGHLAND LAKE WATER COMPANY	IL0970255	2	ONLY ONE WELL	36	8/26/2020
HIGHLAND SUBDIVISION	IL0895530	2	ONLY ONE WELL	40	1/8/2021
HILLCREST	IL1410250	1	INADEQUATE STORAGE CAPACITY	1400	11/2/2017
HILLSDALE ESTATES, LLC	IL1615530	1	ONLY ONE WELL	63	8/14/2020
HILLSDALE PROPERTIES	IL1615728	1	ONLY ONE WELL	60	6/24/2020
HOLLANDS GROVE COURT SUBDIVISION	IL1795300	5	ONLY ONE WELL	40	12/2/2020
HOLLY HOCK HILL MHP	IL0975245	2	ONLY ONE WELL	52	8/28/2020
HOPEWELL	IL1235150	1	ONLY ONE WELL	420	7/1/2020
IL AMERICAN - LEONORE	IL0990400	1	ONLY ONE WELL	111	8/26/2020
IL AMERICAN - MIDWEST PALOS	IL0317050	2	ONLY ONE WELL	143	1/27/2021
IL AMERICAN - NETTLE CREEK	IL0630040	2	ONLY ONE WELL	285	1/29/2021
IL AMERICAN - RIDGECREST	IL0635100	2	ONLY ONE WELL	219	1/29/2021
IL PRAIRIE ESTATE SBDV WATER ASSN	IL0995300	1	ONLY ONE WELL	112	8/26/2020
INDIAN BLUFFS SUBDIVISION	IL1615520	1	ONLY ONE WELL	150	8/14/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
INDIAN CREEK HOMEOWNERS AND WATER ASSN	IL1135250	4	ONLY ONE WELL	240	6/17/2020
IROQUOIS MOBILE ESTATES, INC.	IL0755185	4	ONLY ONE WELL	105	1/8/2021
JOHNSBURG 1	IL1110040	2	ONLY ONE WELL	174	8/28/2020
KENNEY	IL0390200	4	ONLY ONE WELL	374	1/29/2021
KNOLLS EDGE SUBDIVISION	IL1415250	1	ONLY ONE WELL	100	7/17/2020
LAFAYETTE	IL1750100	1	ONLY ONE WELL	250	12/2/2020
LAKE LYNWOOD WATER SYSTEM	IL0735330	1	ONLY ONE WELL	75	1/6/2021
LAKE SHANNON	IL0910020	2	ONLY ONE WELL	500	1/13/2021
LAKE WILDWIND LLC	IL2035125	1	ONLY ONE WELL	200	12/4/2020
LAND AND WATER ASSOCIATION	IL0995050	1	ONLY ONE WELL	100	8/26/2020
LASALLE	IL0990300	1	INADEQUATE SOURCE CAPACITY & INADEQUATE TREATMENT CAPACITY	9700	11/1/2004
LINDENWOOD WATER ASSOCIATION	IL1415300	1	ONLY ONE WELL	35	7/22/2020
LISBON NORTH, INC.	IL0631000	2	ONLY ONE WELL	25	1/29/2021
LYNN WATER ASSOCIATION	IL0735100	1	ONLY ONE WELL	42	1/8/2021
LYNNWOOD WATER CORPORATION	IL0995336	1	ONLY ONE WELL	110	8/26/2020
LYNWOOD 3RD ADDITION	IL0735280	1	ONLY ONE WELL	100	1/6/2021
M C L W SYSTEM, INC.	IL1315150	1	ONLY ONE WELL	98	7/10/2020
MACOMB	IL1090350	5	INADEQUATE CLARIFIER CAPACITY	11309	12/14/2016
MAQUON	IL0950350	5	ONLY ONE WELL	284	1/13/2021
MARSEILLES SOUTH	IL0990110	1	ONLY ONE WELL	100	8/26/2020
MASON CITY	IL1250350	5	INADEQUATE STORAGE CAPACITY	2558	1/1/2006
MAYFAIR SUBDIVISION	IL1795750	5	ONLY ONE WELL	90	12/11/2020
MAZON**	IL0630500	2	NEAR A MANGANESE MCL VIOLATION	987	7/8/2022
MC NABB	IL1550150	1	ONLY ONE WELL	310	6/11/2020
MILL POINT MHP	IL2035165	1	ONLY ONE WELL	160	12/4/2020
MOUND CITY	IL1530100	7	ONLY ONE WELL	588	6/5/2020
MOUND PWD	IL1635050	6	INADEQUATE PLANT CAPACITY	2200	6/17/1996
MOUNT MORRIS ESTATES MHP	IL1415185	1	ONLY ONE WELL	395	7/15/2020
MOUNT VERNON ASSOCIATION INC.	IL0855100	1	ONLY ONE WELL	490	1/8/2021

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
NORTH HAZELWOOD SUBDIVISION	IL0735850	1	ONLY ONE WELL	100	1/8/2021
NORTH HENDERSON	IL1310300	1	ONLY ONE WELL	187	7/2/2020
OAK GROVE MHP - ROCK ISLAND COUNTY	IL1617785	1	ONLY ONE WELL	100	12/2/2020
OAK VIEW ESTATES	IL0730120	1	ONLY ONE WELL	95	1/29/2021
OAKWOOD WEST SUBDIVISION	IL0730070	1	ONLY ONE WELL	45	1/29/2021
OLNEY	IL1590200	7	INADEQUATE TREATMENT CAPACITY	9315	10/28/2022
OPHIEM PWS	IL0735150	1	ONLY ONE WELL	100	1/8/2021
OTTAWA ESTATES MHP	IL0995225	1	ONLY ONE WELL	115	8/26/2020
PARADISE MANOR MHP	IL1617665	1	ONLY ONE WELL	200	11/20/2020
PARK MEADOWLAND WEST MHP	IL0075235	1	ONLY ONE WELL	100	1/27/2021
PAULS MHP	IL0975485	2	ONLY ONE WELL	38	8/28/2020
PHIL-AIRE ESTATES MHP	IL2015625	1	ONLY ONE WELL	80	12/4/2020
POLO DR AND SADDLE RD SUBDIVISION	IL0437000	1	ONLY ONE WELL	93	1/29/2021
PORT BARRINGTON SHORES SUBDIVISION	IL0971120	2	ONLY ONE WELL	67	8/26/2020
POWERS WATER CO., INC	IL0895550	2	ONLY ONE WELL	214	1/8/2021
PRAIRIE OAKS ESTATES HOMEOWNERS' ASSOCIATION	IL0630060	2	ONLY ONE WELL	107	1/29/2021
PRAIRIE PATH WATER - CAMELOT	IL1975200	2	ONLY ONE WELL	575	12/9/2020
PRAIRIE PATH WATER - CHERRY HILL WATER COMPANY	IL1975280	2	ONLY ONE WELL	624	12/9/2020
PRAIRIE VIEW WATER ASSOCIATION	IL1795900	5	ONLY ONE WELL	35	12/11/2020
QUINCY	IL0010650	5	INADEQUATE CLARIFIER CAPACITY	45000	8/3/2016
RAINBOW LANE MHP	IL2015645	1	ONLY ONE WELL	83	12/4/2020
RAINBOW RIDGE	IL1615580	1	ONLY ONE WELL	46	8/14/2020
REDDICK	IL0914780	2	ONLY ONE WELL	210	1/8/2021
RIDGEWOOD LEDGES WATER ASSOCIATION	IL1615670	1	ONLY ONE WELL	430	6/24/2020
ROLLING GREEN ESTATES MHP	IL1415245	1	ONLY ONE WELL	215	7/17/2020
RUSTIC ACRES WATER ASSOCIATION	IL0735500	1	ONLY ONE WELL	260	1/6/2021
SANTA FE ESTATES WATER ASSOCIATION	IL1435490	5	ONLY ONE WELL	84	7/29/2020
SEATON	IL1310350	1	ONLY ONE WELL	200	7/2/2020
SENECA MOBILE HOMES LLC	IL0995425	1	ONLY ONE WELL	73	8/26/2020
SHERIDAN CORRECTIONAL CENTER*	IL0995840	1	INADEQATE TREATMENT CAPACITY	1800	1/27/2023
SIX OAKS MHP	IL2015685	1	ONLY ONE WELL	48	12/4/2020

SYSTEM NAME	SYSTEM ID	EPA REGION	NATURE OF PROBLEM	POPULATION SERVED	LISTING DATE
SPIN LAKE HOMEOWNERS' ASSOCIATION	IL1135140	4	ONLY ONE WELL	200	6/16/2020
STELLE COMMUNITY ASSOCIATION	IL0535100	4	ONLY ONE WELL	100	1/29/2021
STORYBOOK HIGHLANDS	IL0935250	2	ONLY ONE WELL	100	1/13/2021
STRATFORD WEST APARTMENTS	IL1095200	5	ONLY ONE WELL	44	8/26/2020
STRAWN	IL1050700	4	ONLY ONE WELL	133	8/26/2020
SUBURBAN HEIGHTS SUBDIVISION	IL1615800	1	ONLY ONE WELL	57	11/20/2020
TENNANTS SHADY OAKS SUBDIVISION	IL1615540	1	ONLY ONE WELL	44	8/14/2020
TIMBER BROOK ESTATES	IL0735450	1	ONLY ONE WELL	120	1/6/2021
TIMBER RIDGE SUBDIVISION	IL0735470	1	ONLY ONE WELL	120	1/6/2021
TISKILWA	IL0111050	1	INADEQUATE STORAGE CAPACITY	830	9/20/2017
TOWER RIDGE SUBDIVISION	IL1615780	1	ONLY ONE WELL	70	11/20/2020
VALLEY VIEW MANOR**	IL0195865	4	ONLY ONE WELL	120	1/27/2021
VAN ORIN WATER COMPANY	IL0115000	1	ONLY ONE WELL	100	1/27/2021
VICTORIA	IL0950550	5	ONLY ONE WELL	316	1/13/2021
WATER WERKS	IL1615130	1	ONLY ONE WELL	90	8/5/2020
WATERMAN	IL0370600	1	ONLY ONE WELL	1506	1/27/2021
WHITE HALL	IL0610400	6	INADEQUATE STORAGE CAPACITY	2900	10/1/2012
WINDCREST SUBDIVISION	IL0730040	1	ONLY ONE WELL	40	1/29/2021
WINDING CREEK ESTATES	IL1615850	1	ONLY ONE WELL	160	11/20/2020
WINSLOW	IL1770550	1	ONLY ONE WELL	350	12/2/2020
WITT	IL1350850	5	INADEQUATE TREATMENT CAPACITY	991	3/17/2008
YATES CITY	IL0950700	5	ONLY ONE WELL	750	1/13/2021
YOUNGS HILLCREST MHP	IL0190040	4	ONLY ONE WELL	34	1/27/2021

TABLE D

2022 Baseline Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	136
Lack of Certified Operator	15
Lead and Copper	13
Monitoring	13
DBP MCL	13
Manganese MCL	9
Treatment Capacity	8
Issue CCR	7
Radium MCL	4
Storage Capacity	4
Source Capacity (not well)	3
Managerial Capacity	3
MOR Submission	3
Maintain Cl^- Residual	3
Cross Connection Program	3
Nitrate MCL	2
Material Inventory	2
Arsenic MCL	1
E. Coli MCL	1
Emergency Op Plan	1
Permit Needed	1
Back-up Power	1
Combined Filter Effluent	1
Chlorine MRDL	1
Well Abandonment	0

TABLE E

2023 Data from CR and Master NOV List

Deficiency Type	Amount
Only 1 Well	143
Certified Operator	10
Lead and Copper	7
Monitoring	10
DBP MCL	11
Manganese MCL	1
Plant Capacity	12
CCR	4
Radiological MCL	1
Storage Capacity	5
Source Capacity (not well)	4
Managerial Capacity	13
MOR Submission	23
Chlorination	10
Cross Connection Program	31
Nitrate MCL	0
Material Inventory	0
Arsenic MCL	0
E. Coli MCL	0
Emergency Op Plan	15
Permit Needed	11
Back-up Power	3
Flushing Program	16
Well Abandonment	1
Nitrification Action Plan	14
Flushing Program	16
Other Technical Deficiencies	15

Table F

New Non-Community Water Supplies

From State FY 2021 Through FY 2023

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3162651	Swedish Covenant Hospital	A	11-7-19 – P 2-10-22 - A	No	Yes
IL3162669	Nussbaum Properties #2	A	11-8-19 – P 2-16-22 - A	No	Yes
IL3162867	Loves Travel Stop	A	1-7-20 – P 1-18-22 - A	No	Yes
IL3163121	Blessing Hospital	P	4-22-20	No	Not Active
IL3163204	Tree House Foods	P	7-10-20	No	Not Active
IL3163147	SERENITY HOSPICE & HOME	A	7-22-20	No	Yes
IL3163287	Illinois Marine Towing	P	10-9-20	No	Not Active
IL3163311	Blunier Builders	P	10-30-20	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163360	ST PETER LUTHERAN CHURCH/SONSHINE CHRIST	A	11-6-20 – 8-18-22 -changed to Transient System	No	N/A
IL3162883	WEDRON SILICA PIT BUILDING	A	11-10-20	No	Yes
IL3163188	US SILICA OTTAWA SOUTH PIT	A	11-25-20	No	Yes
IL3162354	CHICAGO AUTISM ACADEMY	A	11-25-20	No	Yes
IL3163527	Morris Hospital	P	12-3-20	No	Not Active
IL3162461	AVOCATE CHRIST MEDICAL CENTER	A	12-8-20	No	Yes
IL3163162	SPANCRETE INDUSTRIES INC.	A	12-8-20	No	Yes
IL3162131	JUGANDO SE APRENDE	A	12-17-20	No	Yes
IL3162313	BRANDT INDUSTRIES USA LTD	A	12-28-20	No	Yes
IL3162610	ALLOY SPECIALTIES (10500320)	A	12-29-20	No	Yes
IL3163097	LAUNCH ENRICHMENT L3C	A	12-31-20	No	Yes
IL3163600	McHenry Hospital	P	1-8-21	No	Not Active
IL3162842	NORTHWESTERN COMM HOSP OUTPT CARE CTR	A	1-12-21	No	Yes
IL3161992	CATERPILLER - PEORIA PROVING GROUNDS	A	1-15-21	No	Yes
IL3163626	PHARMACANN	A	1-15-21	No	Yes

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3163667	Alexian Brothers Medical Ctr	A	10-27-22	No	Yes
IL3162297	MEADOW LANE SCHOOL	A	4-2-21	No	Yes
IL3163725	Northwestern Medicine Woodstock Hospital	A	4-5-21 – P 2-9-22 - A	No	Yes
IL3161828	NORTHERN WHITE SANDS LLC	A	4-15-21	No	Yes
IL3163824	MULLER-PINEHURST DAIRY	A	4-21-21	No	Yes
IL3163832	THE MOSQUITO AUTHORITY	I	4-21-21 – P 1-6-22 - I	No	Not Active
IL3163875	CORE FX INGREDIENTS	A	4-23-21	No	Yes
IL3163519	RAY TRAPP - OFFICES/WAREHOUSE	I	5-20-21	No	Not Active
IL3164020	OSF St. Francis Hospital	P	5-21-21	No	Not Active
IL3163253	HIGHLAND PARK HOSPITAL	A	5-28-21	No	Yes
IL3164129	Sygenta	p	7-22-21	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active

Facility #	Facility Name	Facility Status A=Active P=Proposed I=Inactive	Activation Date	ETT Score >11	Compliant with Certified Operator Requirement
IL3164269	POPLAR GROVE AIRPORT	A	2-9-22	No	Yes
IL3162628	IN GROWN FARMS 2 LLC	A	2-9-22	No	Yes
IL3164350	ALUMI TANK INC	A	3-24-22	No	Yes
IL3164442	NUTRIEN AG SOLUTIONS	A	5-10-22	No	Yes
IL3163774	LOVES TRAVEL STOP	A	4-16-21 – P 7-7-22 – A	No	Yes
IL3164624	THE FORGE: LEMONT QUARRIES	A	8-10-22	No	Yes
IL3165027	GUIDEPOST MONTESSORI	A	7-12-23	No	Yes
IL3164640	Hampshire Farms	P	8-12-22 – P	No	Not Active
IL3164657	3804 N. Cunningham Property	P	8-12-22 – P	No	Not Active
IL3164673	Jesse Brown VA Medical Ctr.	P	8-16-22 – P	No	Not Active
IL3164905	Career Center of So. IL	P	4-3-23 – P	No	Not Active
IL3164913	OSF St Paul Medical Center	P	4-18-23 – P	No	Not Active
IL3165118	GFL IL - Elburn Transfer Station	P	7-26-23 – P	No	Not Active
IL3165134	Franciscan Sisters Medical Office	P	8-3-23 – P	No	Not Active
IL3165142	UofChicago AED	P	8-3-23 – P	No	Not Active
IL3165159	UofChicago CCD	P	8-3-23 - P	No	Not Active

TABLE G

NCPWS State FY 2023 Violations Issued *

NOV Issued	Facility Name	Facility ID Number	NOV Number	NOV Description
8/18/2022	AMERICAN LEGION POST 489	IL3029694	NV2022016	Nitrate M/R
10/14/2022	BALMORAL ELEM	IL3082024	NV2022052	Failure to have Qualified Operator
8/4/2022	BLACK MARINE INC CAMPGROUND	IL3134635	NV2022008	Nitrate M/R, Coliform M/R and 2021 SSU
8/18/2022	BRISTOL TAP	IL3138859	NV2022021	Nitrate M/R
9/7/2022	CAMP MATHIEU	IL3017814	NV2022015	Nitrate M/R, Coliform M/R and 2021/2022 SSU
9/16/2022	CAMP ONE WAY	IL3097790	NV2022034	Nitrate M/R and Nitrite M/R
10/21/2022	COG HILL COUNTRY CLUB	IL3088518	NV2022051	Failure to have Qualified Operator, PBCU M/R, and SOC M/R
8/18/2022	CROSSROADS CHURCH	IL3151415	NV2022022	Nitrate M/R
9/16/2022	DEER CREEK CAMPGROUND	IL3149484	NV2022035	Nitrate M/R, Coliform M/R and 2021/2022 SSU
6/16/2023	DIAMOND SLOTS	IL3114652	NV2023001	Nitrate MCL, Nitrate M/R, and Nitrite M/R
9/21/2022	DUNHAM WOODS RIDING CLUB	IL3068510	NV2022038	Coliform M/R
8/4/2022	ERIE CAMPGROUND	IL3097931	NV2022003	Nitrate M/R
9/30/2022	EUREKA SPORTSMENS CLUB	IL3058628	NV2022037	2021/2022 SSU
10/17/2022	FOUR WILLOWS GOLF COURSE	IL3130997	NV2022028	Nitrate M/R (2018/2019)
8/4/2022	GAMBER COVE	IL3069104	NV2022004	Nitrate M/R
8/3/2022	GLENWOOD RV RESORT	IL3000711	NV2022001	Nitrate M/R and 2021 SSU
8/4/2022	GLENWOOD RV RESORT (120832)	IL3120832	NV2022006	Nitrate M/R and 2021 SSU
9/22/2022	GRASS LAKE MARINA	IL3120782	NV2022026	Coliform M/R and 2021/2022 SSU
9/30/2022	HI VU MOTEL	IL3096255	NV2022041	Nitrate M/R
9/30/2022	JIMBOS TAVERN	IL3103135	NV2022042	Nitrate M/R
10/25/2022	JUGANDO SE APRENDE	IL3162131	NV2022045	All Monitoring and Operator Violations addressed
9/1/2022	JW MARRIOT HOTEL	IL3156836	NV2022032	PBCU M/R, Failure to have Qualified Operator, and DBP M/R
8/4/2022	LAKE RAWSON	IL3021907	NV2022002	Nitrate M/R, Coliform M/R, and 2021 SSU
9/1/2022	LAKEWOOD HILLS BEACH	IL3122440	NV2022027	Nitrate M/R and 2021/2022 SSU
9/30/2022	LEDGES SWIM CLUB	IL3124891	NV2022043	Nitrate M/R, Coliform M/R and 2022 SSU
9/22/2022	MARY ANN BEEBE CTR/ACTIVITY CTR (18226)	IL3018226	NV2022039	2022 SSU
8/3/2022	MOONS LITTLE ACRES	IL3017517	NV2022005	Nitrate M/R
9/30/2022	MOSYS BAR AND GRILL	IL3161220	NV2022044	Nitrate M/R
10/14/2022	MOTHER TERESA CATHOLIC ACADEMY	IL3024281	NV2022046	Failure to have Qualified Operator

8/18/2022	P N A YOUTH CAMP ASSN	IL3033449	NV2022017	Coliform M/R and 2021/2022 SSU
9/16/2022	PONDEROSA WILDERNESS AREA	IL3010611	NV2022036	2021/2022 SSU
10/21/2022	SMOKIN'Z BBQ LLC	IL3164111	NV2022054	Failure to have Qualified Operator, Initial PBCU M/R, SOC M/R, and VOC M/R
8/4/2022	STEITZS RESORT	IL3023242	NV2022010	Nitrate M/R and Coliform M/R
10/21/2022	TALEEM UL HAQ	IL3161752	NV2022048	Failure to have Qualified Operator, Lead Consumer Notice, PN VL and SOC M/R
10/21/2022	TPG PRESSURE, INC.	IL3046318	NV2022053	Failure to have Qualified Operator
10/21/2022	TPG PRESSURE, INC. - WEST WELL	IL3153924	NV2022049	Failure to have Qualified Operator, Follow-Up PBCU M/R, and PN VL
8/3/2022	TRENTON SPORTSMAN CLUB	IL3002121	NV2022014	Nitrate M/R
10/6/2022	WEBBS VALLEY VIEW CAMPGROUND	IL3122275	NV2022007	Nitrate M/R
8/4/2022	WILDWOOD CAMPGROUND	IL3057646	NV2022012	Nitrate M/R

**If more than one violation occurred at a facility, each type of violation is counted in baseline data in Table H*

TABLE H (State Fiscal Year 2023 Data from Master NOV List)

Violation Type	Amount
ARSENIC MONITORING, ROUTINE MAJOR	
CHLORINE MONITORING, ROUTINE MAJOR	
QUALIFIED OPERATOR FAILURE	9
E. COLI MONITORING, ROUTINE MAJOR	8
IOCS MONITORING, ROUTINE MAJOR	
FOLLOW-UP OR ROUTINE TAP M/R (LCR)	5
INITIAL TAP SAMPLING (LCR)	1
LEAD CONSUMER NOTICE (LCR)	1
NITRATE MCL	1
NITRATE MONITORING, ROUTINE MAJOR	24
NITRITE MONITORING, ROUTINE MAJOR	2
PUBLIC NOTICE	3
STARTUP PROCEDURES TT (RTCR)	11
SOC MONITORING, ROUTINE MAJOR	3
TOTAL THM-HAA5 MONITORING, ROUTINE MAJOR	1
VOCS MONITORING, ROUTINE MAJOR	1

Attachment 1

TMF PRE-SCREENING SURVEY

Public Water Supply Name: Click or tap here to enter text. Facility ID #: Click or tap here to enter text.

Date: Click or tap here to enter text. Prepared by: Click or tap here to enter text.

TECHNICAL CAPACITY

Record your system's total annual pumpage for the past year (gallons): Click or tap here to enter text.	
Record peak 7-day week of pumpage (gallons): Click or tap here to enter text. Dates: Click or tap here to enter text.	
List the amount of water billed or sold to customers for the past year (gallons): Click or tap here to enter text.	
Number of service connections: Click or tap here to enter text.	
Population served: Click or tap here to enter text.	
List plant capacity (GPD): Click or tap here to enter text.	
List total well capacity (GPD): Click or tap here to enter text.	
List total well capacity with largest well out of service (GPD): Click or tap here to enter text.	
Is standby/emergency power equipment exercised?	☐ YES ☐ NO ☐ N/A
If yes, specify the source of stand-by power and associated kW rating: Click or tap here to enter text.	
Is emergency power in place to operate both the source and plant to meet average day demand?	☐ YES ☐ NO ☐ N/A
Is emergency power in place to operate all booster stations necessary to maintain pressure?	☐ YES ☐ NO ☐ N/A
Frequency of exercise: ☐ Weekly ☐ Monthly ☐ Quarterly ☐ Annual ☐ Other - Click or tap here to enter text.	
Can your system provide uninterrupted water service for 24 hours without electrical power?	☐ YES ☐ NO ☐ N/A
Is there any water main less than 3 inches (if in rural area) or 4 inches (if in urban area)?	☐ YES ☐ NO ☐ N/A
Total length of water mains (miles): Click or tap here to enter text.	
Length of water main replaced in the past three years (miles): Click or tap here to enter text.	
Number of water main repairs in the past three years: Click or tap here to enter text.	
Are hydrants routinely flushed and maintained?	☐ YES ☐ NO ☐ N/A
Flush frequency: ☐ Annual ☐ Spring/Fall ☐ As Needed ☐ Other - Click or tap here to enter text.	
List the number of dead ends in the distribution without flushing devices: - Click or tap here to enter text.	
Does the system practice unidirectional flushing?	☐ YES ☐ NO ☐ N/A
Are the locations of all valves in the distribution system precisely known?	☐ YES ☐ NO ☐ N/A
Is there adequate valving to allow for isolation and facilitate unidirectional flushing?	☐ YES ☐ NO ☐ N/A
Are all valves periodically exercised and maintained?	☐ YES ☐ NO ☐ N/A
Is a maintenance log for valves maintained?	☐ YES ☐ NO ☐ N/A
List valve exercising frequency: Click or tap here to enter text.	
Are locations, size and type of mains and valves detailed on records or maps kept in a secure area?	☐ YES ☐ NO ☐ N/A
Are meter pits and curb stops located, unobstructed and accessible?	☐ YES ☐ NO ☐ N/A
Models of all test kits used for water quality monitoring: Click or tap here to enter text.	
List amount of water unaccounted for (%): Click or tap here to enter text.	
Are all customers, water sources and treatment plants metered?	☐ YES ☐ NO ☐ N/A
List the frequency of meter calibration: Click or tap here to enter text.	
What is the average age of meters in the distribution system? (years): Click or tap here to enter text.	
Is your treatment equipment adequate to provide drinking water that meets all drinking water standards?	☐ YES ☐ NO ☐ N/A
List the name of the satellites served: Click or tap here to enter text	
List the names of all emergency interconnections: Click or tap here to enter text.	
Under normal conditions, what is the range of distribution pressure? (psi): Click or tap here to enter text.	
Is the distribution pressure always above 20 psi during large usage events?	☐ YES ☐ NO ☐ N/A

MANAGERIAL CAPACITY

Is there a clear plan of organization and control among the system's managers and operators?	☐ YES ☐ NO ☐ N/A
Are there contingency plans in place for unanticipated loss of key personnel?	☐ YES ☐ NO ☐ N/A
Is a written emergency response plan in place and up to date?	☐ YES ☐ NO ☐ N/A
Is the emergency response plan reviewed at least every three years and revised, if necessary?	☐ YES ☐ NO ☐ N/A
Does the emergency response plan provide alternate sources of water during emergencies?	☐ YES ☐ NO ☐ N/A
What type of alternate water sources are provided? (bottled water, haulers, etc.) Click or tap here to enter text.	
Are employees and water system officials encouraged to attend conferences and seminars to stay current with Public Water Supply requirements and technology?	☐ YES ☐ NO ☐ N/A
Does the utility perform inspections of work performed on the system by outside contractors?	☐ YES ☐ NO ☐ N/A
Are construction permits obtained prior to starting water supply projects that require a permit?	☐ YES ☐ NO ☐ N/A
Are operating permits obtained before placing those improvements into service?	☐ YES ☐ NO ☐ N/A
Do you maintain copies of all water sample results, operating reports and inspection reports?	☐ YES ☐ NO ☐ N/A
Do you issue boil water orders when pressure drops below 20 psi or contamination is suspected?	☐ YES ☐ NO ☐ N/A
Do you notify the IEPA Regional Office when boil water orders are issued?	☐ YES ☐ NO ☐ N/A
Do you notify the local county health department when boil water orders are issued?	☐ YES ☐ NO ☐ N/A
How many boil water orders were issued in the last 12 months? Click or tap here to enter text.	
Describe the boil water order sampling procedures: Click or tap here to enter text.	
Do you have a cross-connection control program?	☐ YES ☐ NO ☐ N/A
Are the cross-connection surveys reviewed after they are returned?	☐ YES ☐ NO ☐ N/A
Is the cross-connection program enforced? (example: shutting off water if not in compliance)	☐ YES ☐ NO ☐ N/A
Do you maintain an inventory of all installed backflow assemblies?	☐ YES ☐ NO ☐ N/A
Do you maintain a tracking system to ensure backflow assemblies are tested at least annually?	☐ YES ☐ NO ☐ N/A
Do you maintain copies of the test results of all backflow assemblies?	☐ YES ☐ NO ☐ N/A
Are the backflow assemblies owned by the system tested at least annually with a tag indicating the testing date?	☐ YES ☐ NO ☐ N/A
Where are the cross-connection survey results and records kept? Click or tap here to enter text.	
When was the last cross connection survey done (required every 3 years)? Click or tap here to enter text.	
Please describe any climate resiliency measures implemented at your water system (e.g. drought measures, flood control, etc.): Click or tap here to enter text.	
Does your water system use operational technology?	☐ YES ☐ NO ☐ N/A
If yes, are there any cybersecurity measures in place (e.g. password minimum length, multi-factor authorization, etc.)?	☐ YES ☐ NO ☐ N/A
Please describe the cybersecurity measures, if any: Click or tap here to enter text.	

FINANCIAL CAPACITY

Does your organization have an annual budget for operating and maintaining the water system?	☐ YES ☐ NO ☐ N/A
Are the water rates regularly reviewed? ☐ YES ☐ NO ☐ N/A Date of the last increase: Click or tap here to enter text.	
Does your water system generate sufficient revenue to meet estimated expenses during the current and forecasted budget years?	☐ YES ☐ NO ☐ N/A
Are adequate reserve funds in place to provide for emergency repairs?	☐ YES ☐ NO ☐ N/A
Can your organization cover the costs of an emergency or failure of its most vulnerable component?	☐ YES ☐ NO ☐ N/A
Does your organization have a 5-year Capital Improvement Plan for major water system improvements?	☐ YES ☐ NO ☐ N/A
Are your rates sufficient to meet the costs of the 5-year Capital Improvement Plan?	☐ YES ☐ NO ☐ N/A
Does your organization have procedures for selecting outside contractors and suppliers?	☐ YES ☐ NO ☐ N/A

ASSET MANAGEMENT

Does your water system have an asset management plan in place?	☐ YES ☐ NO ☐ N/A
If yes, when was the asset management plan last updated?: Click or tap here to enter text.	
Is the asset management plan actively utilized?: Click or tap here to enter text.	
Does the asset management plan define level of service goals?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include an inventory of the water system's current assets?	☐ YES ☐ NO ☐ N/A
Does the asset management plan rank the criticality of each asset?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include an operation and maintenance plan for the water system?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include a capital improvement plan?	☐ YES ☐ NO ☐ N/A
Does the asset management plan include a long-term financial strategy?	☐ YES ☐ NO ☐ N/A