Illinois Environmental Protection Agency

Draft Illinois Integrated Report and Section 303(d) List, Combined 2020/2022
Appendix E - Responsiveness Summary

Regarding

February 14, 2022 – March 16, 2022

Public Notice

Illinois Environmental Protection Agency

June 1, 2022

Bureau of Water

Draft Illinois Integrated Report and Section 303(d) List, Combined 2020/2022 - Appendix E,

Responsiveness Summary

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ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Draft Illinois Integrated Water Quality Report and Section 303(d) List, Combined 2020/2022

Background Information

The Illinois Environmental Protection Agency (Illinois EPA or Agency) issued notice on February 14, 2022, for public comments on the Bureau of Water draft Illinois Integrated Water Quality Report and Section 303(d) List of Impaired Waters, 2020/2022 (draft Combined 2020/2022 Integrated Report). On February 14, 2022, the draft Combined 2020/2022 Integrated Report was posted on the Illinois EPA website with a public comment period running from February 14 through March 16, 2022.

The draft Combined 2020/2022 Integrated Report identifies Illinois waters that do not meet applicable water quality standards and designated uses. The assessment and evaluation of State waters are required under Sections 303(d), 305(b) and 314 of the federal Clean Water Act (CWA).

Waters that are deemed impaired for specific chemical constituents are identified in the draft Combined 2020/2022 Integrated Report in accordance with Section 303(d). Consequently, additional future loadings of those constituents/pollutants to these waters may be restricted. In addition to possible restrictions on future loadings of those constituents/pollutants to these listed water bodies, waters identified in the Section 303(d) list are subject to the development of Total Maximum Daily Loads (TMDLs). A TMDL is a total allowable amount of a single pollutant that a water body can receive from all contributing sources and still meet water quality standards to protect designated water uses. In Illinois, a TMDL may take the form of a watershed study in which the chemical constituent causing impairment to that water body is evaluated.

Public Notice Record

The Illinois EPA issued a public notice and opened a public comment period for the draft Combined 2020/2022 Integrated Report on February 14, 2022. The public comment period closed on March 16, 2022. During the public comment period, Illinois EPA received five comment letters via electronic correspondence from the public. Additionally, the United States Environmental Protection Agency (USEPA) submitted electronic comments during the public comment period.

This Responsiveness Summary provides the Illinois EPA responses to questions and issues raised during the public comment period.

Agency Responses to Questions, Concerns, and Comments

Questions, concerns, and comments are in regular type. **Agency responses are in bold type.**

1. Legacy Pollutants - Methoxychlor:
   Methoxychlor is listed as a cause of the impairment for Aquatic Life on several segments in the DuPage River Watershed, and the Lower Des Plaines River Watersheds. This pollutant is not listed in table C-5 (Guidelines to Identify Potential Causes of Impairment of Aquatic Life Use in Streams). It is found in table C-23 (Guidelines to Identify Potential Causes of Impairment of Public and Food Processing Water Supply Use in Streams, Lakes, or Lake Michigan). It is also listed in the State water quality standards under public and food processing water supply standards.

   The DuPage River Salt Creek Workgroup (DRSCW), and Lower Des Plaines Watershed Group (LDWG) have tested for Methoxychlor in the sediment at multiple locations on the DuPage River and Des Plaines River watersheds, and several of their tributaries and have not detected this compound at concentrations that indicate it is a stressor to aquatic life. We request clarification for how it is being applied to aquatic life.

   Response:

   Illinois has a methoxychlor water quality standard (WQS) for public water supply intakes of 0.1 mg/L. There are no public water supply intakes on the DuPage River or Des Plaines River watersheds. For General Use waters, Illinois has no water quality standard for methoxychlor; however, Illinois has derived water quality criteria for methoxychlor of 0.25 ug/L for the acute water quality criteria and 0.02 ug/L for the chronic water quality criteria. Prior to the 2012 Integrated Report (IR) Cycle, these pollutants were listed based on past statistical guidelines of sediment concentrations. Since the 2012 IR Cycle, Illinois EPA discontinued its use of guidelines for listing causes of impairment because the guidelines are not based on water quality standards and there is a lack of evidence linking specific sediment guidelines to aquatic life use impairment. Although Illinois EPA no longer uses these sediment guidelines, Illinois EPA does not

intend to consider dissociating these past causes from all waters at this time. However, Illinois EPA will remove these causes when aquatic life use is assessed as fully supporting as outlined in Appendix B-3: Total Nitrogen, Sedimentation/Siltation, and Other Non-Standards-Based Pollutants as Causes of Use Impairment in the Integrated 305(b)/303(d) Water-Quality Report.

2. Edits to Appendix A-1: Specific Assessment Information for Streams, 2020/2022 Per Appendix C-1 303(d) List (In Priority Order), C-2 303(d) List (In Alphabetical Order), and C-4 Segments/Causes Removed from Illinois' 2018 Section 303(d) List, several causes for Aquatic Life Use Impairment have been removed as causes of impairment for specific stream segments. However, these causes of impairment are still listed as causes on Appendix A-1. In the Lower Des Plaines Watershed the following segments, per Appendix C-4, should no longer have these causes of impairment for Aquatic Life listed:

    - IL_G-15 – Chloride and Dissolved Oxygen – no standard violation in new data
    - IL_G-30 – Chloride and Dissolved Oxygen – no standard violation in new data
    - IL_G-11 – Cadmium, Chloride, and Dissolved Oxygen, as well as Fecal Coliform for primary contact – no standard violation in new data
    - IL_G-39 – Cadmium, Chloride, Dissolved Oxygen, and pH – no standard violation in new data
    - IL_GG-22 – Chloride, Dissolved Oxygen, and pH – so standard violation in new data
    - IL_GK-03 – Stream Alteration – no standard violation in new data.

    Note: The LDWG (Lower Des Plaines Watershed Group) has only reviewed Appendix A-1 for waters located in their program area (HUC 0712000405 and 0712000406, 0712000407, 0712000409).

    Response:

    The inclusion of these parameters in Appendix A-1 was an error as all are no longer causes of impairment. This error has been corrected by removing the causes listed above from Appendix A-1.

3. Edits to Appendix A-1: Specific Assessment Information for Streams, 2020/2022 Per Appendix C-1 303(d) List (In Priority Order), C-2 303(d) List (In Alphabetical Order), and C-4 Segments/Causes Removed from Illinois' 2018 Section 303(d) List, several causes for Aquatic Life Use Impairment have been removed as causes of impairment for specific stream segments. However, these causes of impairment are still listed as causes on Appendix A-1.

   In the DRSCW/LDRWC program areas these segments include:
   - IL_GLA-02,
   - IL_GB-11,
   - IL_GBL-10,
   - IL_GL-09,
   - IL_GL-10,
   - IL_GL-19, I
   - L_GBK-05, and
   - IL_GBK-09.

   Note: The DRSCW/LDWG has only reviewed Appendix A-1 for waters located in their program area (HUC 0712000404 and 0712000408).

   Response:

   The inclusion of these parameters in Appendix A-1 was an error as all are no longer causes of impairment. Illinois EPA has removed all incorrect causes from the segments listed above.

4. Appendix A-1 and Appendix A-2
   The following impairments within DuPage County are listed in Appendix C-4 as having been removed from the 303d list. However, these causes are still included in Appendix A-1 Specific Assessment Information for Streams 2020/2022 or Appendix A-2 Specific Assessment Information for Lakes 2020/2022

   - IL_GBK-05 West Branch DuPage River: DO, Sed/Silt, Stream Alt.
   - IL_GBK-09 West Branch DuPage River: chloride, DO, pH, and temperature.
   - IL_GBL- 10 East Branch DuPage River: chloride, cover loss, and stream alterations.
   - IL_GJ-01 Sawmill Creek: flow alterations.
   - IL_GL-09 Salt Creek: chloride, DO, and Sed/ Silt.
   - IL_GL-10 Salt Creek: chloride, DO, Nickel, and pH.
   - Herrick Lake: algae.

   Response:

The inclusion of these parameters in Appendices A-1 and A-2 was an error as all are no longer causes of impairment. Illinois EPA has removed the listed causes from Appendices A-1 and A-2.

5. Arsenic – While IEPA lists numerous water bodies as impaired by mercury due to the Effect of Hg on the healthfulness of fish consumption, the 303(d) entirely ignores the potential effect of arsenic on the fish consumption. The federal criteria to protect human health from arsenic in fish tissue (0.14 ug/L), which appears at 40 U.S.C. 131.36, is ignored and no other criteria is used to consider fish consumption uses.

   Response:

   The Integrated Report is based on the water quality standards that have been adopted by the Illinois Pollution Control Board (IPCB) and approved by USEPA. The IPCB has not adopted the federal criteria to protect human health from arsenic in fish tissue. In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

6. Chloride – While the draft considers acute toxicity of chloride to aquatic life using Illinois' 500 mg/L acute standard (Draft p.23), chronic effects of chloride are not considered. The current federal chronic criterion for chloride is 230 mg/L https://www.epa.gov/wqc/national-recommended-water-quality-criteria-aquatic-life-criteria-table and there is much science that indicates that the federal criteria is not fully protective. See discussion of chloride toxicity in IPCB 18-32 including studies by Dr. Soucek of the University of Illinois.

   Response:

   The Integrated Report is based on the water quality standards that have been adopted by the IPCB and approved by USEPA. The current water quality standard for chloride that has been adopted by the IPCB and approved by USEPA is 500 mg/L. In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

7. Phosphorus- Phosphorus is listed as a cause only as to streams that have been found through observation to be affected by sludge, bottom deposits, floating debris, visible oil, odor, plant, or algal growth (aquatic macrophytes or aquatic algae), color, or turbidity. Draft Report p.45. However, it is apparent from the level of photosynthetic activity indicated by diel dissolved oxygen (DO) movement, DO supersaturation and pH data collected by the United States Geological Service (USGS) that river segments that have not been listed as impaired by phosphorus have been starkly affected by algal blooms or other unnatural plant growth. IEPA should use the criteria recommended by the Illinois Nutrient Science Advisory Committee https://www2.illinois.gov/epa/topics/water-quality/standards/Documents/NSAC%20Report%20-%20Final.pdf to list all rivers and streams with phosphorus levels exceeding those listed in Table 5.1 of the NSAC as impaired. See below.

Response:

The Integrated Report is based on the water quality standards that have been adopted by the IPCB and approved by USEPA. At this time, the IPCB has not adopted the criteria recommended by the Illinois Nutrient Science Advisory Committee. In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

Phosphorus impairments are being addressed in National Pollutant Discharge Elimination System (NPDES) permits by including a Nutrient Assessment and Reduction Plan (NARP) for those facilities that are upstream of a waterbody or stream segment that has been determined to have a phosphorus related impairment or have been determined to have a risk of eutrophication. Those major municipal facilities that are upstream of a phosphorus related impairment are also receiving a phosphorus limit of 1.0 mg/L in the NPDES permit. The conditions of the NARP are:

- **The NARP shall be supported by data and sound scientific rationale.**
- **The NARP shall either utilize the recommendations by the Nutrient Science Advisory Committee or develop its own watershed-specific target levels.**
- **The NARP shall identify phosphorus input reductions by point source discharges and non-point source discharges in addition to other measures necessary to remove phosphorus related impairments in the watershed.**
- **The NARP shall include a schedule for the implementation of the phosphorus input reductions by point sources, non-point sources and other measures necessary to remove phosphorus related impairments.**

8. Microcystin – Another serious shortcoming of the report is to fail to consider the effect of toxics from harmful algal blooms on drinking water and recreational uses. Obviously, a water body that has microcystin levels that are well above the U.S. EPA and WHO criteria is impaired. It makes no sense to report that a water is unimpaired when it is known at times to contain toxics in concentrations that may be fatal to human beings and their pets and livestock.

Response:

Lacking numeric water quality criteria for cyanotoxins, Illinois EPA did not use cyanotoxin data to make use impairment decisions in the 2020/2022 Combined Integrated Report. In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

9. Nitrogen – IEPA should use the criteria recommended by the Illinois Nutrient Science Advisory Committee, https://www2.illinois.gov/epa/topics/waterquality/standards/Documents/NSAC%20Report%20-%20Final.pdf, to list all rivers and streams exceeding the values exceeding those in the following table as impaired.

   Table 5.1: Recommended numeric nutrient criteria by Illinois ecoregion

	Total Phosphorus (µg/L)		Total Nitrogen (µg/L)	
	North Ecoregion	**South Ecoregion**	**North Ecoregion**	**South Ecoregion**
Numeric Criteria	**113**	**110**	**3979**	**901**
Lower 95 % CL	**33**	**18**	**-78†**	**256**
Upper 95 % CL	**193**	**202**	**8036**	**1546**

   Response:

   Refer to Response # 7.

10. Illinois River – The USGS DO, chlorophyll and pH data at Henry. Starved Rock and Seneca make clear that the Illinois River frequently experiences harmful algal blooms.
    i. These blooms are accompanied in cases by very high levels of cyanobacteria.
    ii. Because the river is exhibiting HABs that are sometimes producing toxic levels of cyanobacteria toxins, it is plainly impaired under Illinois narrative criteria and should be listed as impaired by phosphorus and nitrogen.

    Des Plaines, Mississippi, and Rock Rivers – The USGS data shows supersaturation, high chlorophyll levels and or pH levels indicating severe water quality problems.

    Spoon River – USGS data shows exceptionally high nitrate levels.

    Response:

    Section 303(d) of the federal Clean Water Act requires the State to determine whether waters meet established water quality standards. Illinois EPA has determined that to responsibly address the assessments that are based primarily on the "Offensive Conditions" narrative standard in 35 Ill. Adm. Code 302.203, the standard must be interpreted by Illinois EPA staff with knowledge of the natural expectations for lakes and streams. Since the Offensive Conditions standard lacks any strict numerical thresholds, best professional judgment must be used to determine whether the narrative standard is being met or violated.

In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

11. Table ES-3 reports that 100% of statewide lakes have been assessed for Public and Food Processing Water Supply. However, this percentage is inconsistent with information included in Table ES-4 and Appendix A-2, as well as information in ATTAINS. EPA believes the inconsistency is due to rounding. Although Table ES-3 does provide a "Note" regarding rounding errors, EPA suggests that Illinois EPA consider not rounding to 100%. Instead of rounding, Illinois EPA could report 99.7% of statewide lakes have been assessed for Public and Food Processing Water Supply.

    Response:

    Illinois EPA has updated the Integrated Report to report 99.7% of statewide lakes have been assessed for Public and Food Processing Water Supply.

12. Part A., A-1. Reporting Requirements, p. 2, states that potential sources of use impairment are identified in Appendix A. EPA notes that Appendix A does not identify potential sources.

    Response:

    Illinois EPA is not reporting potential sources of impairment in the 2020/2022 Integrated Report. Illinois EPA has updated the Integrated Report to remove the reference to potential sources of use impairment from Part A., A-1.

13. Part A., A-3. Primary Data Sources and Time Periods Covered, Solicitation of Information, p. 6, identifies that Southeast Environmental Task Force (SETF) was an external organization that submitted data or other information. Appendix B-3 includes a footnote stating that SETF did not submit data in the required Excel template format. As noted in EPA's October 20, 2021, comments on Illinois EPA's draft assessment methodology, Illinois EPA's guidance for submitting data for consideration, requires data to be configured and formatted in accordance with the provided template, submission of data in Microsoft Excel is only preferred not required. EPA encourages Illinois EPA to clarify future data solicitations to identify all requirements, including whether data must be submitted in Microsoft Excel. EPA notes that during discussions with Illinois EPA subsequent to EPA's October 2021 comments mentioned above, Illinois EPA did provide further explanation to EPA regarding why SETF submission was considered but not used in development of the 2020/2022 Integrated Report. EPA also notes that the reference to Appendix B-4 in the last paragraph of Part A on p. 6 is incorrect. The correct reference should be Appendix B-3.

Response:

Illinois EPA has updated Appendix B-4 of the Integrated Report to indicate no data was submitted to the Agency by SETF.

Appendix B-4 referenced in the last paragraph of Part A on p. 6 is correct. Illinois EPA has corrected the headings of Appendix B-3 and B-4 in the Table of Contents and Appendix sections as they were mislabeled in the draft Integrated Report Document. In Part A, Appendix B-3 is referenced on p.4 and Appendix B-4 is referenced on p.6.

14. Part C., C-2. Assessment Methodology, Public and Food Processing Water Supply Use, pp. 40-44: Region 5 continues to encourage Illinois EPA to enhance their methodology for assessing the public and food processing water supply use with additional contaminants that threaten water quality (e.g., bromides, HABs). Region 5 is open to having a dialogue with Illinois EPA about other possible future enhancements to the methodology for assessing the public and food processing water supply use.

Response:

Illinois EPA welcomes a discussion with Region 5 regarding possible future enhancements to its methodologies for assessing uses using additional contaminants, including Harmful Algal Bloom data. Illinois EPA is planning to go through the triennial review process in 2022 to seek input on the priorities of the public for updating the IPCB's water quality standards.

15. Part C., C-3. Assessment Results, Table C-32, p. 51, reports the number of stream miles assigned to each of the reporting categories. The number of stream miles reported for category 4A and category 5 in Table C-32 do not match the number of stream miles reported in ATTAINS for these categories. EPA would like to work with Illinois EPA to identify the cause of this discrepancy prior to submission of Illinois EPA's final Integrated Report.

Response:

Table C-32 has been updated to reflect the correct number of stream miles reported in each category as listed in the Assessment, Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS).

16. According to the assessment methodology (see pp. 4 and 56), information from the Illinois EPA Harmful Algal Bloom (HAB) program is used to make assessment determinations. The methodology specific to Aesthetic Quality in Lakes states that information from the HAB program is used (see p. 56). However, in addition to aesthetic quality, the general use in Illinois water quality standards also covers aspects of aquatic life and primary recreation uses, among others, where it may be appropriate to consider data and information collected through the Illinois EPA HAB program. EPA is seeking clarification on how Illinois EPA currently uses cyanotoxin and other algal bloom data and information collected by its HAB program in its assessments, and/or what plans Illinois EPA has to update assessment and listing methodologies related to these parameters for the general use goals that may be impacted by cyanotoxins and HABs (e.g., aesthetic quality, primary contact recreation).

    Response:

    Illinois EPA uses Offensive Conditions observational data collected through the Harmful Algal Bloom and other programs to assess support status for aesthetic quality use for lakes, streams, and Lake Michigan (see 35 Ill. Adm. Code 302.203, 302.515). Illinois EPA will update the future assessment methodology document to clarify how observational data is used.

    In 2022, Illinois EPA plans to seek input from the public, through its triennial review process, to identify priorities for updating the IPCB's water quality standards.

17. IL_UHP | Nielson Pond | aquatic plants/total phosphorus (TP)/total suspended solids (TSS)IL_UHP was retired in the 2020/2022 cycle. Please identify which assessment unit ID is associated with Nielson Pond and its prior assessments in 2020/2022.

    Response:

    IL_UHP was retired, and its assessment information was retained in IL_UHF.

18. IL_ND-01 | Crab Orchard Creek | fecal coliform Please confirm the parameter status and parameter attainment. If the parameter attainment for primary contact use is Not Meeting Criteria, then the parameter status should be Cause instead of Insufficient Information. If a parameter is not meeting criteria for at last one use, then the overall parameter status is Cause. In 2018 fecal coliform was delisted and placed in category 4A due to an approved TMDL (TMDL Action 35275). In 2020/2022, fecal coliform is proposed as a delisting again but with a delisting reason "Not Specified". Please provide more information regarding this proposed delisting.

Response:

The parameter status was corrected, and the delisting reason was removed since fecal was moved to category 4A in prior reporting cycle.

19. Illinois EPA is proposing to delist TSS from the following three assessment units. In 2018 TSS was a parameter cause not meeting threshold for aesthetic quality use. Please provide more information in support of these proposed delisting. If the process explained in Appendix B-4 in the IR is applicable, please include a summary of the cause guideline that was the basis of the original listing and the most recent data used to support the delisting.
    - IL_RGB | Diamond | TSS
    - IL_RGZB | Hastings | TSS
    - IL_RTV | Redhead | TSS

Response:

Total Suspended Solids (TSS) listings for these lakes were determined under an old methodology from a previous cycle (prior to the 2012 IR Cycle) which listed TSS as a cause if the median surface Nonvolatile suspended solids (NVSS) was greater than or equal to 3 mg/L. Although TSS is no longer considered as a potential cause in lakes, new data from this cycle demonstrated TSS levels below the legacy criteria, allowing for the delisting of TSS.

20. Illinois EPA is proposing to delist either nitrogen, sedimentation/siltation, or both from the following assessment units. In 2018 nitrogen was an observed effect, not meeting threshold for aquatic life use (ALU), and sedimentation/siltation was a parameter cause, not meeting threshold or not meeting criteria for ALU. In 2018 and in 2020/2022, ALU is Not Supporting. Please provide more information in support of these proposed delistings. If the process explained in Appendix B-4 of the IR is applicable, please include a summary of how the most recent data conforms with the guidelines for delisting established in Appendix B-4.

Assessment Unit ID	Assessment Unit Name	Parameter(s)	Aquatic Life Use Support
IL_CJA-02	Little Muddy Creek	sedimentation/siltation	Not Supporting
IL_CP-04	Salt Creek	sedimentation/siltation	Not Supporting
IL_DKN-01	Sixmile Creek	sedimentation/siltation	Not Supporting
IL_DZZP-03	Farm Creek	Nitrogen	Not Supporting
IL_FLF-01	Pike Creek	sedimentation/siltation	Not Supporting
IL_G-25	Des Plaines River	sedimentation/siltation	Not Supporting
IL_GB-11	DuPage River	sedimentation/siltation	Not Supporting
IL_GBK-05	West Branch DuPage River	sedimentation/siltation	Not Supporting
IL_GL-09	Salt Creek	sedimentation/siltation	Not Supporting
IL_GLA-02	Addison Creek	Nitrogen	Not Supporting

IL_HB-42	Little Calumet River South	Nitrogen	Not Supporting
IL_HCCC-04	Middle Fork North Branch Chicago River	Nitrogen sedimentation/siltation	Not Supporting
IL_ND-04	Crab Orchard Creek	sedimentation/siltation	Not Supporting
IL_NG-02	Pond Creek	sedimentation/siltation	Not Supporting
IL_OD-06	Silver Creek	Nitrogen sedimentation/siltation	Not Supporting
IL_OE-02	Mud Creek	sedimentation/siltation	Not Supporting
IL_OG-02	Elkhorn Creek	sedimentation/siltation	Not Supporting
IL_OH-05	Sugar Creek	sedimentation/siltation	Not Supporting
IL_OJB-04	Lost Creek	sedimentation/siltation	Not Supporting
IL_OJO-01	Grand Point Creek	sedimentation/siltation	Not Supporting
IL_OJC-03	Grand Point Creek	sedimentation/siltation	Not Supporting
IL_OJCB-19	Sewer Creek	sedimentation/siltation	Not Supporting
IL_PBO-10	Fairfield Union Special Ditch	sedimentation/siltation	Not Supporting

Response:

The method for delisting both total nitrogen and sedimentation/siltation is consistent with the process assigned in Appendix B-3. Any listed legacy causes (total nitrogen and sedimentation/siltation) were removed from any Assessment Units where they were previously listed if the Assessment Unit was designated as "Fully Supporting" for Aquatic Life Use.

Illinois EPA delisted total nitrogen as an observed effect from some Assessment Units that remained "Not Supporting". To do this Illinois EPA created a list of all Assessment Units that had total nitrogen listed as an observed effect by downloading the 2018 assessments and parameters from ATTAINS and searching for total nitrogen observed effects. Then Illinois EPA searched for new total nitrogen data for these Assessment Units from the current cycles' sampling years (2015-2017 and 2017-2019, for 2020 and 2022, respectively). If all total nitrogen observations for an Assessment Unit during the relevant cycle were less than 7.8 mg/l, then total nitrogen was delisted as an observed effect, even if the overall assessment remained "Not Supporting" for Aquatic Life Use for the Assessment Unit.

To delist sedimentation as an observed effect when the Assessment Unit remained "Not Supporting for Aquatic Life Use", field biologists reviewed the Qualitative Habitat Evaluation Index (QHEI) forms and other field notes from any Assessment Units with updated habitat data collected between 2015 and 2019. If the most recent applicable observations of stream-bottom composition indicated that more than 50% of the stream bottom was comprised of silt, mud, or equivalent fine sediment,

sedimentation/siltation remained listed as an observed effect. If these observations indicated that 50% or less of the stream bottom was comprised of silt, mud, or equivalent fine sediment, sedimentation/siltation was delisted as an observed effect for the Assessment Unit.

Illinois EPA, will follow this approach, as outlined in Appendix B-3: Total Nitrogen, Sedimentation/Siltation, and Other Non-Standards-Based Pollutants as Causes of Use Impairment in the Integrated 305(b)/303(d) Water-Quality Report.

21. The following parameters are being delisted from category 5 and moved to category 2 based on "New data available from IL-2018-001-WIP". Please provide more information in support of these delistings. Note, EPA did not find an action in ATTAINS identified as:

    - IL_FLE-02 - Langan Creek | ammonia (total), boron, and DO
    - IL_FLEA-C1 | Clifton North Creek | ammonia (total), boron, copper, and DO
    - IL_FLGB-C1 | Ashkum Creek | ammonia (total), boron, and DO
    - IL_FLGB-C4 | Ashkum Creek | boron
    - IL_FLGZ-C1 | Clifton South Creek | ammonia (total), boron, and DO

    Response:

    The above-listed parameters were returned to category 5. Illinois EPA will provide the delisting rationale to USEPA for review and approval in the 2024 IR cycle.

22. In 2018 dissolved oxygen was identified as a parameter cause not meeting criteria for ALU. In 2020/2022, Illinois EPA is proposing to delist dissolved oxygen and move dissolved oxygen to category 2 due to the approved TMDL Action IL-2020-003. EPA agrees that dissolved oxygen is an addressed parameter by the approved TP TMDL, However, the delisting reason provided (i.e., TMDL Approved) does not support moving dissolved oxygen to category 2. Please provide more information that supports moving dissolved oxygen. Based on EPA's review of the additional information, Illinois EPA may need to change the delisting reason in ATTAINS to correspond with the rationale for placing dissolved oxygen in category 2.

Response:

Hidden Lake (IL_UTM) – Dissolved Oxygen impairment was addressed via TP TMDL as part of the Upper Fox River/Chain O'Lakes TMDL Report (TMDL Action IL-2020-003). Please refer to USEPA's TMDL Approval Letter & Decision Document dated June 4, 2020: https://www2.illinois.gov/epa/topics/water-quality/watershed-management/tmdls/Pages/reports.aspx#ufc).

The category for this parameter has been changed to category 4A and the delisting reason was updated in ATTAINS.

23. Illinois EPA is proposing to delist dissolved oxygen from category 5 based on new data available through the development of TMDL Action IL-2021-003. EPA reviewed the documents available in ATTAINS for TMDL Action IL-2021-003 and could not find information in these documents that addressed IL_FLG. Please provide additional information in support of this proposed delisting.

Response:

This parameter has been placed back in category 5 for the 2020/2022 IR cycle.

Based on the Prairie Creek/Langan Creek TMDL Watershed Study, and Watershed Implementation Plan (WIP) - IL-2018-001-WIP, the parameter was recommended for delisting. Illinois EPA will provide the delisting rationale to USEPA for review and approval in the 2024 IR cycle.

24. In 2018 dissolved oxygen was a parameter cause in category 5 for the following three assessment units. In 2020/2022, dissolved oxygen has been moved to category 4C. EPA did not find a delisting reason in ATTAINS nor did EPA observe any recent assessment information in the Assessment Comment field in ATTAINS in support of these proposed delistings. Please provide additional information and a delisting reason in ATTAINS to support moving dissolved oxygen to category 4C.

- IL_NI-01 | Gun Creek | DO
- IL_NL-01 | Snow Creek | DO
- IL_RNZB | Ashley Reservoir | DO

Response:

These delistings were made in error. This error was corrected by maintaining Dissolved Oxygen in category 4C for these segments, to remain consistent with the 2018 assessment cycle.

25. In 2020/2022 Illinois EPA associated the following assessment units and parameters with approved TMDL Actions resulting in moving these parameters from category 5 to category 4A. Based on EPA's review of the decision documents for the associated TMDL Actions, EPA did not find EPA approved TMDLs addressing the parameters in the table below. Please either remove the association with the TMDL Action for these parameters or provide additional information for EPA's review explaining how the TMDL addressed these parameters.

Assessment Unit ID	Assessment Unit Name	Parameter	Associated TMDL Action ID	TMDL Name	EPA Approval Date
IL_AJF-02	Cedar Creek	DO manganese	33207	Bay Creek Watershed TMDL	9/18/2007
IL_RAT	Vienna Corr. Cntr.	manganese	33209		
IL_DAZN	Briar Creek	DO	31004	Macoupin Creek Watershed TMDL	9/27/2006
IL_GBK-14	West Branch DuPage River	chloride	10831	West Branch DuPage River Chloride TMDL	9/23/2004
IL_GL	Salt Creek	chloride	10838	Salt Creek TMDL	9/29/2004
		DO	35371	South Fork Saline River Lake Egypt TMDL	7/18/2008
IL_EOH-02	Flat Branch	fecal coliform	12283	Sangamon Watershed TMDL	9/30/2005
IL_ROR	Salem	DO	35291	Crooked Creek Watershed TMDL	8/15/2008
IL_HCCD-01	Skokie River	TP	IL-2020-001	North Branch Chicago River Watershed TMDL	4/13/2020[1]
IL_HCCC-02	Middle Fork North Branch Chicago River	DO	IL-2020-001		
IL_RTZF	Tower (Lake)	TSS	IL-2020-002	Upper Fox River – Flint	
IL_RTZT	Barrington	TSS			

[1] EPA's decision document for the North Branch Chicago River Watershed TMDL includes a discussion regarding DO impairments for waterbodies in the NBCR watershed in which the decision document states that Illinois EPA did not develop TMDLs to address dissolved oxygen.

Assessment Unit ID	Assessment Unit Name	Parameter	Associated TMDL Action ID	TMDL Name	EPA Approval Date
IL_STV	Woodland (Highland)	TSS		Creek Watershed TMDL	6/2/2020[2]
IL_FLIDD-01	Pigeon Creek	fecal coliform	37896	Kankakee River/Iroquois River Watershed TMDL	9/30/2009

Regarding IL_AJF-02, TMDL Action 33207 does address manganese and DO for an 11.92 miles portion of Cedar Creek with AUID ILAJF01-AFJ. Please provide additional information to explain if IL_AJF-02, which is 1.95 miles, is a portion of ILAJ F01-AFJ. Regarding IL_FLIDD-01, TMDL Action 37896 does address IL_FLIDDc, Pigeon Creek. However, EPA did not have enough information to determine if IL_FLIDDc and IL_FLIDD-01 are the same assessment unit. Please provide additional information.

Response:

Incorrect associations between TMDLs and parameters/assessment units have been removed. IL_FLIDD-01 had previously been named IL_FLIDDc. The Assessment Unit Identification (AUID) for this segment was renamed to correct an error in coding that was present in the 2012 Integrated Report Cycle – Appendix D. Changes in Assessment Unit IDs between 2010 and 2012.

26. Illinois EPA is moving the parameter Cause Unknown from category 5 to category 2 for several assessment units. EPA would like to discuss whether Cause Unknown should be removed or moved to category 2. Some of the assessment units that are moving Cause Unknown from category 5 to category 2 are listed below.

    - IL_BFCA-22 | Marathon Creek
    - IL_C-12 | Little Wabash River
    - IL_C-22 | Little Wabash River
    - IL_DAG-02 | Hodges Creek
    - IL_DQA-01 | East Bureau Creek
    - IL_HF-01 | Tinley Creek
    - IL_IXFC | Cooper Creek
    - IL_NZL | Mud Creek
    - IL_OZZJ-01 | Jordan Creek

[2] EPA's decision document for the Upper Fox River – Flint Creek Watershed TMDL notes that Illinois EPA did not develop TMDLs to address TSS impairments, rather the State developed Load Reduction Strategies for TSS.

- IL_P-25 | Rock River
- IL_PQC-05 | South Branch Kishwaukee River
- IL_RGZD | Miltmore

Response:

Illinois EPA will clarify procedure for removal of Cause Unknown with USEPA for future assessment cycles.

27. In 2018 the following parameters were delisted as a cause with a delisting reason of "Applicable WQS attained; reason for recovery unspecified." In 2020/2022 these parameters are identified as causes. Please confirm it is Illinois EPA's intent to identify these parameters as causes in the current listing cycle.

    - IL_NJ | Casey Fork | DO
    - IL_P-O4 | Rock River | fecal coliform

    Response:

    Yes, it is IEPA's intent to identify these parameters as causes in the current listing cycle due to updated water chemistry for Dissolved Oxygen, and fecal coliform for these segments.

28. In prior cycles dissolved oxygen was placed in category 4C as an impairment caused by a non-pollutant based on information obtained during TMDL development. Please confirm it is Illinois EPA's intent to identify dissolved oxygen for the following assessment units as a parameter cause in the current listing cycle.

    - IL_OZH-OK-A2 | Plum Creek-North | DO
    - IL_OZH-OK-C2 | Plum Creek-North | DO
    - IL_OZH-OK-C3 | Plum Creek-North | DO

    Response:

    The above water body segments were placed in Category 4C in the 2018 IR Cycle and will remain in Category 4C for the 2020/2022 IR Cycle.

29. Moving a parameter out of category 5 due to an approved TMDL is considered a delisting in ATTAINS and a delisting reason should be provided. The likely delisting reason is DELISTING_4A. Also, parameters in category 4A no longer need a 303(d) Priority Ranking. In 2020/2022 Illinois EPA associated several parameters with TMDL Actions resulting in moving these parameters from category 5 to category 4A. However, many of these delistings did not include a delisting reason and included a priority ranking. Please add an applicable delisting reason and remove the priority rankings that no longer apply to the category 4A listings include in the attached Excel file, worksheet *DelistCorrestions5to4A.*

    In addition to parameters moving from category 5 to category 4A due to association with an approved TMDL, the attached worksheet also includes a few parameters added directly to

category 4A in 2020/2022 that included a priority ranking. Please remove the priority ranking in ATTAINS.

Response:

Applicable delisting reasons were added, and priority rankings were removed for category 4A listings identified in the spreadsheet for the 2020/2022 IR Cycle.

30. In 2018 Illinois EPA delisted the parameters identified below and moved these parameters to category 2. These parameters are not included in 2020/2022. Is there an assessment related reason why these parameters are not included? If not, EPA encourages the State to maintain these past assessments in ATTAINS.

    - IL_JMAC-02 | Harding Ditch | TP and TSS
    - IL_JQ-05 | Cahokia Creek | DO and manganese
    - IL_JR-02 | Wood River | TSS
    - IL_O-08 | Kaskaskia River | atrazine

    Response:

    These parameters were removed in error. There was no assessment related reason to remove the parameters listed above. Therefore, they will remain in category 2.

31. In 2020/2022 Illinois EPA is proposing to delist dissolved oxygen. The current Delisting Reason is "Not Specified" with "Segment is Fully supporting for 2020 cycle" as Delisting Comment. The Delisting Reason and the delisting comment appear inconsistent. If the State has determined that the segment is fully supporting but cannot determine the cause of restoration, please change the Delisting Reason to "WQS_Recovery_Unspecified". This Delisting Reason is used when a WQS is attained but the reason for the recovery cannot be identified. GB-16 DuPage River

    Response:

    The delisting of dissolved oxygen for GB-16 was an error. Continuous monitoring data showed a >10% Dissolved Oxygen violation. The water body segment is "Not Supporting", and Dissolved Oxygen should not be delisted. Dissolved Oxygen is now in category 5 for this segment.

32. In 2020/2022 Illinois EPA added assessments for several new parameters that were found to be meeting criteria or meeting threshold and were placed directly into category 2. None of these parameters were included in the 2018 IR, however, these parameters were identified as delistings and included a Delisting Reason. Since these parameters are new in 2020/2022, please remove the Delisting Reason in ATTAINS. Additionally, none of these parameters include a Parameter Attainment. Please include the Parameter Attainment in ATTAINS. See the attached Excel file, worksheet *new-w-delist-no-attainment.*

    EPA notes that for three of the assessment units (IL_E-05, IL_EIG-01, and IL_PW-01) identified in the worksheet are placing the parameter Cause Unknown in category 2. As noted in comment 10 above, EPA would like to discuss the appropriate category for the parameter Cause Unknown.

    Response:

    Cause unknown was removed for assessment units IL_E-05, IL_EIG-01, and IL_PW-01.

33. The third worksheet in the attached Excel file, *missingParaAttainment,* identifies parameters that were delisted in 2020/2022 and moved to category 2 based on new data but, these parameters have no Parameter Attainment. Please complete the Parameter Attainment field in ATTAINS.

    Response:

    All parameters were updated, except IL_DLGC-01 for Dissolved Oxygen which is shown in ATTAINS as a cause in category 5. This is consistent with the assessment comments which indicate a greater than 10% Dissolved Oxygen exceedance in continuous monitoring data. The Pollutant Indicator was changed to "Yes" and Priority to "Medium" for IL_DLGC-01.

34. The Report and List Are Not User-Friendly: While we appreciate the effort to simplify these documents from past versions, with 58 pages of technical discussion and 16 lengthy appendices, the Report and List are still complicated and not user-friendly. It is cumbersome for the general public to utilize the information contained in the Report and List in order to identify the condition of waters in which they may be interested. It is difficult to have local involvement and understanding with regard to the Total Maximum Daily Load (TMDL) process when local people cannot use the document that lists which waters are impaired.

    Response:

    Illinois EPA regrets that some users find the report difficult to use. The format of the report follows USEPA guidance for fulfilling the requirements of sections 303(d), 305(b), and 314 of the federal Clean Water Act. Illinois EPA currently has no system, database, or website where the public can access all the data it collects or uses to make assessments. However, the public is welcome at any time to request specific data from Illinois EPA,

Bureau of Water, Surface Water Section or Groundwater Section. Illinois EPA will provide the requested information as expeditiously and completely as possible.

Please refer to the Freedom of Information Act Request requirements on Illinois EPA's webpage for more details at: https://www2.illinois.gov/epa/foia/Pages/default.aspx

Illinois EPA welcomes any suggestions on how to improve the draft report to be user friendly and easily understandable.

Please also make a note, USEPA recently developed a tool (How's My Waterway: https://www.epa.gov/waterdata/hows-my-waterway), designed to help the public access the water quality status, information on swimming, eating fish, and aquatic life at a community, state, or national scale. This tool may also be accessed from a mobile device (entering address, zip code or place).

Please visit the following programs at USEPA's website for additional water quality data information:

- **The Assessment, Total Maximum Daily Load (TMDL) Tracking and Implementation System (ATTAINS) is an online system for accessing information about the conditions in the Nation's surface waters.**
  ATTAINS: https://www.epa.gov/waterdata/attains

- **The water quality data is available at USEPA's web site, and here is the link:**
  Water Quality Data: https://www.epa.gov/waterdata/water-quality-data.

35. Voluntary Programs Work: Illinois Farm Bureau (IFB) encourages Illinois EPA to continue to help develop voluntary, incentive-based programs to implement phases of the TMDL plans. Voluntary, incentive-based programs work for agriculture to address nonpoint source issues. They are a logical approach to improve water quality.

    The trends derived from voluntary, incentive-based programs are positive. Illinois EPA's Section 319 grant program is an example of how nonpoint source issues can be positively addressed. Other programs available through the Natural Resources Conservation Service (NRCS) that have had an incentive-based, voluntary tone include the Conservation Reserve Program, the Conservation Reserve Enhancement Program, the Environmental Quality Program and the Wetlands Reserve Program. Incentive-based, voluntary programs are also available through the Illinois Department of Agriculture and other state agencies. These programs have had positive effects on water quality.

    The challenge that continues to face farmers with voluntary programs, however, is that historically there have not been sufficient funds, nor the technical assistance, available to help farmers implement these programs. Voluntary natural resource programs also depend on the availability of scientific research to help farmers make sound management decisions. Farmers need the ability to utilize new technologies and should not be mandated to use practices that leave them with little room to use innovative farming methods to continue the positive environmental trends we have seen.

IFB supports the use of voluntary best management practices in all phases of farming operations to address water quality issues. We have urged our members to be involved with watershed programs at the local level. We encourage Illinois EPA to develop tools to help local watershed groups in their efforts to improve water quality. In addition, IFB is also actively involved in groups like the Illinois Nutrient Research and Education Council (NREC) and the Illinois Council on Best Management Practices (CBMP) to help Illinois farmers improve their nutrient use, while at the same time optimizing harvest yield and minimizing water quality impacts.

Response:

Illinois EPA concurs that voluntary, incentive-based programs are a good approach to support Illinois agricultural producer's implementation of the TMDLs nonpoint source (NPS) pollution control recommendations to improve water quality. Illinois EPA agrees that more technical and financial resources, including tools and research, would benefit Illinois' agriculture producers' voluntary efforts to control NPS pollution on their property. Illinois Farm Bureau member participation in the development and implementation of watershed-based plans (WBP) and TMDLs is strongly encouraged. When local stakeholders, participating in the development of a WBP or TMDL, identify the obstacles and their potential solutions to implement NPS pollution control projects in the plans, Clean Water Act funds (specifically Section 319) can be used to help implement those proposed NPS pollution control projects – whether its technical assistance for one-on-one landowner education or cost-share for best management practices.

Illinois EPA is working to increase the staffing levels of the Watershed Management Section to increase technical support and pursue the development and implementation of capacity-building tools for NPS pollution control.

36. Simplification of Causes of Impairment Was Warranted: The Section titled "Non-standards-based pollutant causes of use impairment" describes efforts to stop using cause guidelines and instead focus on Illinois water-quality standards. Assuming that is the case, we would support this effort to simplify the Report and help to focus on water quality impairments based on Illinois water-quality standards.

Response:

Illinois EPA acknowledges that some past-identified causes that remain associated with Illinois 303(d)-listed water bodies are not directly related to Illinois water quality standards. In the 2008 and 2012 Integrated Reports, Illinois EPA provided to USEPA its basis for removing waters or potential causes based on guidelines that were not directly related to Illinois water-quality standards. Recently, USEPA and Illinois EPA resolved longstanding disagreement on these causes. Illinois EPA will not apply former statistical guidelines for any new identifications of causes of use impairment as outlined in Appendix B-3: Total Nitrogen, Sedimentation/Siltation, and Other Non-Standards-

Based Pollutants as Causes of Use Impairment in the Integrated 305(b)/303(d) Water-Quality Report.

37. Data Needs to Accurately Reflect Current Stream Conditions: The main concern IFB has consistently raised regarding the List focuses on the data used to rank nonpoint source waters. Data used to place water segments on the List should be taken from various sections of a water segment and at multiple times of the year in order to have a robust data set that accurately reflects current stream conditions. It is preferable for the State to spend its resources ensuring that the data collected for the List accurately reflects the current condition of the stream, rather than to base plans on inaccurate or incomplete information. Plans developed on inaccurate and incomplete information will not achieve desired water quality improvements. Data Should Be Shared with Local Watershed Groups: Another needed change in the process is that Illinois EPA should develop a method to easily share the specific field data used to list water segments with local people.

    Response:

    Surface water assessments in this 2020/2022 report are based primarily on biological, water-chemistry, physical habitat, and fish-tissue information collected from 2015 through 2019 by various monitoring programs (Illinois EPA 2014). These programs include the Ambient Water Quality Monitoring Network, Intensive Basin Surveys, Facility-Related Stream Surveys, the Fish Contaminant Monitoring Program, the Ambient Lake Monitoring Program, the Volunteer Lake Monitoring Program, the Lake Michigan Monitoring Program, TMDL monitoring, and other outside sources.

    Please refer to Section A-3 for additional data assessment information.

38. In the Section of the Report entitled, "TMDL Development and Implementation Status", it states: The Illinois EPA views TMDLs as a tool for developing water-quality-based solutions that are incorporated into an overall watershed management approach. The TMDL establishes the link between water quality standards attainment and water-quality-based control actions. For these control actions to be successful, they must be developed in conjunction with local involvement, which incorporates regulatory, voluntary, and incentive-based approaches with existing applicable laws and programs.

    Local people should be able to quickly get the field data Illinois EPA collected and used to list their water. If local people do not know specifically why their stream is listed, how can they be expected to help address their water quality issues?

    The listing of waters on the List and the development of TMDLs are complicated issues. IFB encourages Illinois EPA to do everything possible so that local watersheds can easily determine whether they have impaired stream segments.

Response:

The Illinois TMDL Program has a three-stage approach to the TMDL development process.

The stages are:

- **Stage 1 – Watershed Characterization, Data Analysis, Methodology Selection**
- **Stage 2 – Data Collection (if needed)**
- **Stage 3 – Model Calibration, TMDL Scenarios, Implementation Plan**

The Draft TMDL Reports are posted on Illinois EPA's website and made available for viewing/downloading the information. In addition, watershed workgroups, SWCD, NRCS, NPDES Permittees in the watershed, and other non-governmental organizations are notified by mail or email about the draft TMDL Report and the public meeting. Illinois EPA conducts public meetings during Stages 1 and 3. Comments received from those meetings are addressed and incorporated in the TMDL Report.

39. Data Should be Shared with Local Agencies: To help ensure correct data, IFB recommends that Illinois EPA and the contractors share information they have about a specific watershed with local agencies – such as the Soil and Water Conservation Districts, NRCS and University of Illinois Extension Service offices. Local agencies know the watershed and they should be able to review and comment on the data Illinois EPA has on watersheds to ensure accuracy. Illinois EPA should then address comments from local agencies on the data prior to issuance of the draft TMDL.

Response:

Refer to response #34.

40. Goals in TMDL Should Be Achievable: The goals developed for a TMDL should be achievable. When the goals for a TMDL are unrealistic, then the whole TMDL is discredited by those who know the watershed and by those who know how natural systems respond to certain practices. There should be a recognition that human uses of land have impacts. We need to continue to improve water quality; however, there needs to be some realism in the process because we cannot, no matter what practices are implemented, go back to pre-settlement conditions. This realism needs to be taken into account in the development of plans and goals to address natural resource issues.

Response:

The objective of a TMDL is to determine the loading capacity of the waterbody and to allocate that load among different pollutant sources so that the appropriate control actions can be taken, and water quality standards achieved. Load allocations are determined through the review of monitoring data and watershed modeling. The tools used depends upon the complexity of the problem. As part of the TMDL development process, Illinois EPA continues to engage watershed workgroups, landowners, and other

interested parties in the development of the implementation plan and best management practices (BMPs) to address impairments to bring waterbody segments to meet water quality standards and their designated uses.

41. Does IEPA plan to issue a new 303(d) streams GIS shapefile for the 2020/2022 cycle to the RMMS website? Is there a 303d list GIS map product searchable by the "Assessment Unit ID, and are there watershed maps for the 2020/2022 IR cycle?

    Response:

    Illinois EPA will work with the University of Illinois to add the 2020/2022 305(b) and 303(d) streams and lakes coverages into the Resource Management Mapping Service (RMMS).

    Illinois EPA has created a web application map for a quick reference regarding Illinois' 303(d) and 305(b) surface waters: https://illinois-epa.maps.arcgis.com/apps/webappviewer/index.html?id=773c1711e0e9417ea7cd6cad8afb66ea**. The map contains a collection of layer-data, i.e., (Assessment Unit ID), watersheds (Hydrologic Unit Codes), and identifiable landmarks (roads, county boundaries, etc.)) that are related to water body locations. Users can view, manage, and analyze the data.**

    A set of watershed maps have been added into the 2020/2022 Draft IR (please refer to Appendix C-8).

Acronyms and Abbreviations

Agency or Illinois EPA or IEPA	Illinois Environmental Protection Agency
ALU	Aquatic Life Use
ATTAINS	Assessment, Total Maximum Daily Load (TMDL) Tracking and Implementation System
AUID	Assessment Unit Identification
BMPs	Best Management Practices
CDOM	Continuous Dissolved Oxygen Monitoring
CWA	Clean Water Act
DO	Dissolved Oxygen
DRSCW	DuPage River Salt Creek Workgroup
GIS	Geographical Information System
HABs	Harmful Algal Blooms
HUC	Hydrologic Unit Code
IAL	Indigenous Aquatic Life
IFB	Illinois Farm Bureau
IPCB	Illinois Pollution Control Board
IR	Integrated Report
fIBI	Fish Index of Biological Integrity
LDWG	Lower Des Plaines Watershed Group
LDRWC	Lower DuPage River Watershed Coalition
MBI	Macroinvertebrate Biotic Index
NPDES	National Pollutant Discharge Elimination System
NPS	Nonpoint Source

NVSS	Nonvolatile Suspended Solids
NARP	Nutrient Assessment Reduction Plan
mg/L	Milligrams per Liter
mL	Milliliter
mIBI	Macroinvertebrate Index of Biological Integrity
NIP	Nutrient Implementation Plan
QHEI	Qualitative Habitat Evaluation Index
RMMS	Resource Management Mapping Service
SETF	Southeast Environmental Task Force
TMDL	Total Maximum Daily Load
TP	Total Phosphorus
TSI	Tropic State Index
TSS	Total Suspended Solids
ug/L	Micrograms per Liter
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
WBP	Watershed-Based Plan
WHO	World Health Organization

Distribution of Responsiveness Summary

A letter announcing the completion of this Responsiveness Summary and its availability on the Agency website was mailed or emailed to all on the contact list for the draft 2020/2022 Integrated Report and to all who submitted comments. Additional copies of this Responsiveness Summary are available from Shirley Durr, Illinois EPA, e-mail Shirley.Durr@illinois.gov, phone 217-782-3362.

Agency Staff Who Can Answer Your Questions

Questions concerning the 2020/2022 Integrated Report:

Questions about the 2020/2022 Integrated Report
Nicole Vidales.....217-782-3362

Questions about Legal Procedures
Stefanie Diers.....217-782-5544

The full 2020/2022 Integrated Report (including appendices, Appendix E is this Responsiveness Summary), and other documents associated with the report are available on the Illinois EPA's website:

https://www2.illinois.gov/epa/topics/water-quality/watershed-management/tmdls/Pages/303d-list.aspx

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