ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR DOUGLAS P. SCOTT, DIRECTOR

217/782-8482

November 10, 2010

Mr. Thomas Poy, Chief
Groundwater and Drinking Water Branch WG-15J
U. S. Environmental Protection Agency
77 west Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mr. Poy:

Please find enclosed the Illinois Report on the Efficacy of Capacity Development for Federal Fiscal Year 2010, as required by Section 1420 of the Safe Drinking Water Act Amendments of 1996. If there are any questions or comments on the report, please feel free to contact Dave McMillan of my staff at 217/782-1020 for clarification.

Sincerely,

Richard P. Cobb, P.G.
Deputy Manager
Division of Public Water Supplies
Bureau of Water

Enclosure

cc. Sahba Rouhani, U.S. EPA Region 5/GW-DW Branch
Annette English, U.S. EPA Region 5/GW-DW Branch
Janette Kuefler, U.S. EPA Region 5/GW-DW Branch

Illinois

ANNUAL REPORT ON THE EFFICACY OF CAPACITY DEVELOPMENT October 1, 2010

Illinois Environmental Protection Agency
Division of Public Water Supplies
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

November 2010

This report is intended to meet the Capacity Development Program reporting requirements under the Safe Drinking Water Act Amendments of 1996 (PL 104-182, August 6, 1996, Title XIV, Section 1420).

As described in the Illinois Annual Report of the Efficacy of Capacity Development, September 30, 2005 (available at: http://www.epa.state.il.us/water/field-ops/drinking-water/capacity-development/index.html), Illinois' program has been implemented in two parts.

1. First, all new public water supplies that became active after October 1, 1999, were required to complete a capacity development demonstration. Illinois adopted regulations to implement this requirement. Failure to meet this deadline would have resulted in a loss of up to 20% of the State Revolving Loan Fund monies allocated to Illinois each year.
2. Second, Illinois was required to develop a Capacity Development Strategy by September 30, 2000. The purpose of this Strategy is to structure a work plan that Illinois will implement to ensure that existing public water supplies have the capacity to achieve compliance, and continue to operate in compliance with all existing and future drinking water program standards and requirements. Failure to meet this deadline would have resulted in a loss of up to 20% of the State Revolving Loan Fund monies allocated to Illinois each year. The Illinois Capacity Development Strategy was approved by USEPA on September 27, 2000.

Furthermore, as required, in 2008 a triennial report to the Governor of the Illinois was prepared and made available to the public (at http://www.epa.state.il.us/water/field-ops/drinking-water/capacity-development/index.html). The Illinois Environmental Protection Agency (EPA) and Department of Public Health (DPH) continue to support the capacity development program and are convinced that maintaining overall public water system capacity is essential in operating a safe public water supply. Implementation of substantial technical assistance is requisite to accomplishing capacity development in public water supplies that are in distress. This is a high priority of both Illinois EPA and DPH. Many of the original premises presented in the Illinois Capacity Development Strategy are proving to be accurate. That is, the resource demands of true capacity assistance are significant. However, Illinois continues to believe that capacity development is an integral element of the working relationship between regulatory staff and public water supply officials. As such, capacity demonstration elements will continue to be integrated into the routine activities of both Agencies in order to ensure that progress is made.

Public water supplies experiencing significant non-compliance problems were first targeted for capacity development assistance, and are identified in the Illinois Strategy as Tier 1 supplies. Those undergoing formal enforcement are given an opportunity to possibly extend the final compliance date when agreement is reached for the supply to complete a capacity demonstration. This process provides an opportunity for the supply to determine complete overall compliance needs, rather than address only the specific current violations, and to develop a plan that will work toward achieving and maintaining compliance in all areas. Furthermore, water supplies with recurring problems or violations are a second priority (Tier 2) for capacity demonstration. These water supplies are encouraged to complete a capacity demonstration in order to remain in compliance, or to eliminate sporadic non-compliance episodes. The final priority (Tier 3) for capacity program implementation is water supplies that are in compliance at this time. It is

important that new and existing officials and operators are cognizant of the technical, managerial and financial efforts needed for a water supply to remain in compliance. Education and assistance efforts require considerable time on the part of field and headquarters staff, but have been incorporated as much as possible into routine activities to achieve continued compliance through education and cooperation of water supply officials and operators. When statewide or regional educational needs are identified, Illinois EPA works with one or more professional associations to ensure that necessary topics are covered, and that training is provided to as many water supply operators or officials as possible. This targeted effort assists water suppliers in maintaining compliance and increasing capacity. Additionally, Illinois EPA's role in providing technical assistance whenever possible and helping water suppliers locate and coordinate with other organizations and agencies when specific financial or managerial skills are needed is a key to the success of capacity development. These assistance and coordination efforts maximize existing resources while developing new tools within the Agency only when truly necessary.

The Illinois DPH, by interagency agreement with the Illinois EPA, has regulatory authority over the Non-Community Public Water Systems (NCPWS) in Illinois. Pursuant to this agreement, capacity development as it relates to Non-Transient Non-Community Public Water Systems (NTNCPWS) is the responsibility of the Department. The NCPWS Program is unique in that 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 the management. The water supply at these facilities is used for drinking, sanitation, and in some cases, manufacturing processes. Demonstrating capacity for these types of non-community water systems is, for the most part, a small part of the overall management, budget and operating plan for a specific public water supply. Illinois DPH uses existing field survey and visit opportunities to identify NCPWSs which need or may benefit from capacity development assistance, but approaches the water supply compliance issues from a somewhat unique perspective of a side benefit activity rather than a primary activity, and must work within the framework of the entire operation to best assist the supply in developing capacity. Central office staff coordinates the dissemination of information and education of NCPWS personnel for all new or amended regulations and requirements. When capacity assistance is needed on-site, central office staff accompanies field staff or local health department staff to provide training or technical assistance.

In summary, the following documentation provides the reporting criteria for the annual State Capacity Development Program Implementation Report as required by U.S. EPA through guidance from Cynthia Dougherty in her June 1, 2005 Memorandum. The Illinois EPA and DPH anticipate this information fulfills the annual reporting requirements for Illinois' approved strategy. **The reporting period for the data provided in this summary includes information culminating with FFY 2010, as queried from data systems on October 1, 2010 and September 27, 2010 by the Illinois DPH and EPA, respectively.**

New Systems Program Annual Reporting Criteria

- There have been no modifications to Illinois' legal authority to implement New System Programs. (see *ILLINOIS ANNUAL REPORT ON THE EFFICACY OFCAPACITY DEVELOPMENT, September 30, 2005* at: http://www.epa.state.il.us/water/field-ops/drinking-water/capacity-development/index.html)*

- There have not been any modifications to Illinois' control points. (see *ILLINOIS ANNUAL REPORT ON THE EFFICACY OFCAPACITY DEVELOPMENT, September 30, 2005)*†

- The following data summarizes the Annual new system data for the Capacity Development Program.‡

Annual Report on New Systems Capacity Development Program October 1, 2009 – September 30, 2010	
Method(s) used to evaluate and verify program implementation	Construction and Operating Permits
Number of proposed new CWSs	1
Number of proposed new NTNCWSs	4
Number of approved new CWSs	2
Number of approved new NTNCWSs	4
Number of new CWSs (commenced operation after October 1, 1999)	81

* U.S. EPA believes this information will help identify whether States have maintained the necessary authority to implement the new systems program.

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

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

Number of new CWSs (commenced operation after October 1, 2003)	36[§]
Number of new CWSs activated since October 1, 2003 considered to be in "significant non-compliance"	0
Number of new NTNCWSs (commenced operation after October 1, 1999)	94
Number of new NTNCWSs (commenced operation after January 1, 2004)	54[**]
Number of new NTNCWSs activated since January 1, 2004 considered to in "significant non-compliance"	0
Number of new CWSs that are not in compliance, Reason for non-compliance:	0
Number of new NTNCWs that are not in compliance, *(These are mostly Phase II/V and LCR monitoring violations. Owner/Operators are generally new to the Drinking Water Regulations and have difficulty keeping up with the testing schedule and their other job duties.)*	8

Existing System Strategy

- There have been no modifications to Illinois' existing systems strategy. Both the Illinois EPA and the Illinois DPH utilized existing programs, tools and activities as described in the *ILLINOIS ANNUAL REPORT ON THE EFFICACY OFCAPACITY DEVELOPMENT, September 30, 2005*. In addition, please refer to Attachment 3 that includes a "Response to Inquiries Regarding Illinois' 2004 Capacity Development Annual Report, March 25, 2005 for further programmatic detail.

- Illinois has continued to identify systems in need of technical, financial and managerial capacity development, as described in the *ILLINOIS ANNUAL REPORT ON THE EFFICACY OFCAPACITY DEVELOPMENT, September 30, 2005* and Attachment 3 to this Report.

[§] U.S. EPA has requested the list provided in Attachment 1 to this Report. This data is based upon information queried from SDWIS-State on October 12, 2009.

[**] U.S. EPA has requested the list provided in Attachment 2 to this Report. This data is based upon information queried as of October 30, 2009 by Illinois DPH.

- During the reporting period, no statewide PWS capacity concerns or capacity development needs were identified. Over the reporting period, Illinois EPA conducted over 663 Engineering Evaluations (Sanitary Surveys) at community water systems and Illinois DPH conducted approximately 200 sanitary surveys at NTNCWS. Public water system capacity concerns were evaluated during each of these evaluations. During these evaluations, the Illinois EPA and DPH found that each system had to be handled on an individual basis and no common trends not previously noted were identified.

- During the reporting period, no revisions or modifications to the implementation strategy for existing system strategy were made.

Attachment 1:

Community Public Water Supply Facilities Activated between October 1, 2003 and September 30, 2010				
Facility #	**Facility Name**	**Facility Status (A=Active)**	**Activation Date**	**SNC Status**
IL1690020	DHS RUSHVILLE TREATMENT AND REHABILITATION CENTER	A	31-Aug-09	Not SNC
IL1050500	DANA/LONG POINT, READING, ANCONA RWD	A	01-Jun-09	Not SNC
IL1710020	SCOTT COUNTY RURAL WATER DISTRICT	A	24-Jul-08	Not SNC
IL0170010	CASS COUNTY RURAL WATER DISTRICT	A	01-May-08	Not SNC
IL1590200	OLNEY	A	03-Apr-08	Not SNC
IL1375050	NORTH MORGAN WATER COOP	A	01-Nov-07	Not SNC
IL1110930	MEADOWS OF WEST BAY WATER	A	19-Oct-07	Not SNC
IL2010080	SHERIDAN GROVE SUBDIVISION	A	19-Sep-07	Not SNC
IL1090030	WEST PRAIRIE WATER CO-OP	A	22-Aug-07	Not SNC
IL0310200	WOODS OF SOUTH BARRINGTON	A	26-Jul-07	Not SNC
IL0315617	EDWARD HINES JR V A HOSPITAL	A	17-May-07	Not SNC
IL0270040	GATEWAY WATER COMPANY	A	10-May-07	Not SNC
IL1235125	AUTUMN RIDGE ESTATES	A	29-Mar-07	Not SNC
IL0750910	SUGAR CREEK MANUFACTURED HOME COMM., LLC	A	15-Nov-06	Not SNC
IL1150020	BOODY COMMUNITY WATER COMPANY	A	23-Oct-06	Not SNC
IL0975070	AQUA ILLINOIS-RAVENNA	A	24-Aug-06	Not SNC
IL1135130	WILLOW CREEK NORTH MHP	A	23-Aug-06	Not SNC
IL0311540	LA GRANGE ESTATES MHP	A	06-Jul-06	Not SNC
IL0990560	MENDOTA MOBILE HOME COMMUNITY	A	01-May-06	Not SNC
IL0310370	LINDENTREE TOWNHOMES	A	01-Dec-05	Not SNC
IL1110130	WOODS CREEK WATER SUPPLY	A	30-Nov-05	Not SNC
IL0890160	PINGREE GROVE	A	06-Oct-05	Not SNC
IL1030350	SAUK VALLEY STUDENT HOUSING	A	28-Sep-05	Not SNC
IL0315850	STERLING ESTATES MHP	A	01-Jul-05	Not SNC
IL2010030	FOREST VIEW MHP	A	01-Jun-05	Not SNC

IL0975040	AQUA ILLINOIS-HAWTHORN WOODS	A	01-Jan-05	Not SNC
IL0375500	NORTHERN ILLINOIS UNIVERSITY-DEKALB	A	24-Nov-04	Not SNC
IL0070350	POPLAR GROVE WEST-COUNTRYSIDE	A	01-Oct-04	Not SNC
IL1430080	BUFFALO HOLLOW FARMS WATER ASSOC	A	07-Sep-04	Not SNC
IL1050650	IL AMERICAN-SAUNEMIN	A	01-Sep-04	Not SNC
IL0971200	PRAIRIE TRAILS OF LONG GROVE	A	18-Feb-04	Not SNC
IL1170060	SOUTH PALMYRA WATER COMMISSION	A	19-Dec-03	Not SNC
IL0350100	JEWETT	A	01-Dec-03	Not SNC
IL1090020	SCIOTA	A	01-Nov-03	Not SNC
IL1730020	LINCOLN PRAIRIE WATER COMPANY	A	01-Nov-03	Not SNC
IL0995840	SHERIDAN CRCTL CNTR	A	15-Oct-03	Not SNC

Note: FOSSIL ROCK RECREATION AREA (IL1971150) and POOR CLARES MONASTERY (IL0310320) were previously listed as new CWSs. Fossil Rock also had an unaddressed SNC. However, both of these facilities have become "Inactive" community water supplies on October 13, 2007 and April 9, 2009, respectively. BERNADOTT TOWNSHIP (IL0578020) was previously listed as a new active CWS. However, this system was incorrectly coded and remains in "Proposed" status.

Attachment 2

Non-Transient Non-Community Water Supplies Activated between January 1, 2004 and September 30, 2010				
Facility #	**Facility Name**	**Facility Status (A=Active)**	**Activation Date**	**SNC Status**
IL3147652	Cornerstone Christian Academy	A	2-24-04	Not SNC
IL3147660	Springhaven Park	A	3-1-04	Not SNC
Il3147728	American Precision Electronics	A	3-10-04	SNC - Addressed
IL3147801	All State West Plaza	A	3-25-04	Not SNC
IL3147900	Barbara Rose Elementary School	A	6-10-04	Not SNC
IL3148361	Will County Forest Preserve Op & Maint.	A	10-18-04	Not SNC
IL3148430	Rankin School Dist	A	9-7-04	SNC - Addressed
IL3148619	North Boone High School (09-27-04)	A	1-4-05	Not SNC
IL3148742	Barrington Methodist Church	A	3-29-05	Not SNC
IL3149039	Monsanto Agronomy Center	A	6-6-05	Not SNC
IL3149088	Pepsico Beverage Corp.	A	6-7-05	Not SNC
IL3149252	Countryside Private School	A	10-3-05	SNC - Addressed
IL3149427	Motel 55	A	10-4-05	SNC - Addressed
IL3149443	Wilton Federated Church	A – Changed to Transient System	10-4-05	SNC - Addressed
IL3149591	Plainfield Township	A – Changed to Transient System	1-23-06	SNC - Addressed
IL3149807	Flower Garden Toddler Center	I	2-1-06	Not SNC
IL3149849	Walco Tool and Engineering	A – Changed to Transient System	2-15-06	Not SNC
IL3150052	Toolamation	A	4-21-06	Not SNC
IL3150102	Forming America Ltd.	A	4-25-06	SNC - Addressed
IL3150169	Merichkas	A	5-11-06	Not SNC
IL3150433	Crest Foods Production	A	11-2-06	Not SNC
IL3150441	Crest Foods Warehouse	A	11-2-06	SNC - Addressed
IL3150548	Monsanto Seeds	A	11-2-06	Not SNC
Il3150581	Victory Christian Center	A	1-24-07	SNC - Addressed
IL3150748	Seward Screw Products 16377	A	3-7-07	Not SNC
IL3150763	Illinois Crime Lab	A	3-7-07	Not SNC

IL3151654	Monsanto Corn Research	A – Changed to Transient System	1-9-08	Not SNC
IL3151670	Pioneer Hi-Bred Intl. Corn Research	A	3-4-08	Not SNC
IL3151944	Freemont Intermediate School	A	4-2-08	Not SNC
IL3152173	Sav A Pet	A	5-14-08	Not SNC
IL3152223	Apachi Day Camp	A	5-1-08	Not SNC
IL3152462	Danisco	A	10-1-08	Not SNC
IL3152504	Monsanto Office	A	10-1-08	Not SNC
IL3152629	Patriot Renewable Fuels	A	12-17-08	Not SNC
IL3152744	Mary Sears Child Care	A	12-29-08	Not SNC
IL3152850	Deans Food Company	A	12-29-08	Not SNC
IL3153019	Chemtool Rockton	A	3-12-09	Not SNC
IL3153023	Pentecostal Center	I	12-17-08	Not SNC
IL3153064	Menards	A	2-3-09	Not SNC
IL3153072	Jewel Wells Spring Grove	A	3-31-09	Not SNC
IL3153080	Pioneer Hi-bred Int.	A	3-31-09	Not SNC
IL3153924	Hanson Pressure Pipe West Well	A	6-3-09	Not SNC
IL3153213	Little Bit Country Preschool	A – Changed to Transient System	6-25-09	Not SNC
IL3153288	Cross Roads Community Church	A	6-25-09	Not SNC
IL3153346	Scott Company Hyponex	A	6-25-09	Not SNC
IL3153411	Vermilion Power Station	A	9-17-09	Not SNC
IL3153569	Rovanco Piping System Inc.	A	9-25-09	Not SNC
IL3153890	Curry Ice & Coal	I	12-30-09	Not SNC
IL3154047	Full Fill Industries	A	2-16-10	Not SNC
IL3154476	Open Bible Church	A	3-30-10	Not SNC
IL3154724	Lifes Little Miracles	A	4-13-10	Not SNC
IL3154567	Moore Tires Inc.	A	4-26-10	Not SNC
IL3154633	Lutheran General Hospital	A	6-24-10	Not SNC
IL3154666	Monroe Center School 2nd Well	A	6-24-10	Not SNC

Attachment 3:

Response to Inquiries
Regarding Illinois' 2004 Capacity Development Annual Report
March 25, 2005

1. How are the Field Operations Section (FOS) activities coordinated based on the prioritization system as specified in your approved CD Strategy? The CD strategy specifies a three-tier system that will be used to identify and assist systems. How is FOS incorporating this tier system into their work?

The three-tiered capacity prioritization system described in the 2000 Capacity Strategy was linked to the Agency Enforcement Management System (EMS), adopted by all bureaus within Illinois EPA on October 4, 2004. Prior to that date, capacity prioritization also took into account the provisions of Section 31(a) of the Illinois Environmental Protection Act (Act) as required. The EMS is used to define the process by which all programs within IEPA pursue compliance. The general objective of the EMS is to protect the public health and environment of Illinois through enforcement of environmental regulatory requirements in a timely, consistent and fair manner. The EMS includes compliance monitoring and enforcement procedures that must be used by **all** Agency regulatory programs.

The EMS Strategy, based upon Section 31(a) of the Act, requires the Agency to issue a Violation Notice (VN) within 180 days of becoming aware of a violation. All Priority One supplies fall into the VN category. In order to return to compliance, a Compliance Commitment Agreement (CCA) must be executed by the public water supply and the Agency. The Agency monitors compliance with the CCA until compliance is achieved. Failure to meet the conditions of the agreement or renegotiate the agreement based upon changed circumstances results in formal referral to the State Attorney General for enforcement. Information regarding a capacity development demonstration as a part of the compliance achievement process is offered as a step in that process each time a VN is issued. Technical assistance is provided during the compliance process, regardless of whether or not a supplier decides to complete a full capacity demonstration as a part of the CCA. In some cases, the Agency may require a capacity development demonstration as a step in the CCA.

An informal warning letter, called a Noncompliance Advisory (NCA) letter, is used for Priority Two supplies. If a water supply fails to come into compliance when a NCA has been issued, a VN is issued. Information regarding a capacity development demonstration as a part of the compliance achievement process is offered as a step in that process each time a NCA or VN is issued. Technical assistance is provided during the compliance process, regardless of whether or not a supplier decides to complete a full capacity demonstration as a part of the CCA.

Priority Three supplies are all other water supplies that receive routine operational visits or scheduled engineering evaluations (sanitary surveys). All supplies scheduled for routine engineering evaluations receive the capacity screening survey. This survey focuses upon key managerial, financial and technical aspects of water supply operation that might not have been adequately addressed prior to the focus upon capacity demonstration.

2. General tracking and oversight at headquarters was initially conducted using a spreadsheet tracking system. Data collected was not easy to retrieve from this format. In October 2004, emphasis was placed upon the use of the SDWIS Inspection and Site Visit Maintenance Report. All field activities are now tracked using this form. By January 2005, all Regions were informed as to the need to use of the report, and have begun to routinely submit the tracking forms to headquarters, where they are entered into SDWIS. All of the codes contained in the Reason Code Table apply to various routine activities that comprise capacity development. Once data is loaded into SDWIS from all systems, USEPA can use SDWIS to extract any combination of data needed to fulfill its reporting requirements.

3. Illinois feels that the Capacity Strategy is sound, and that the additional elements being added to the basic engineering evaluation process through the Capacity Pre-screening Surveys are improving the Division's ability to assess the capacity of each water supply, and to target technical assistance activities. Illinois remains convinced that capacity development is the basic drinking water oversight program, but has expanded its original range of parameters to be surveyed to accommodate the scope of managerial and financial objectives described in guidance by USEPA. Activities of the Groundwater Section are also being factored into the three priority tiers. Capacity development activities conducted by Groundwater Section personnel will also be tracked in SDWIS. By calendar year 2006, sufficient data should be in place to allow better assessment of capacity development assistance. For example, the identification of a specific type of deficiency within a geographic area will facilitate the identification of locations needing outreach activities. Where a cluster of the same deficiency exists, specific training and technical assistance can be offered in that area of deficiency at a convenient location. Assistance with areas of deficiency that need statewide improvement can be provided to organizations that attract statewide participation for inclusion in technical programs. Isolated elements will continue to be handled by individual field offices, or Illinois Rural Water Association personnel.

At some point, within the next 5 - 10 years, depending upon available staff resources, all base technical, managerial and financial (TMF) elements will be in place in the engineering evaluation itself, and the capacity program for existing systems will be absorbed into the ongoing engineering evaluation process. At that time, existing system capacity development will consist of identification and integration of TMF elements required by new or amended regulations into the engineering evaluation process. The new system capacity program will remain in place as a distinguishable, separate program effort.

Illinois continues to measure the success of the capacity development program through water supply compliance rates and increased participation in continuing education sponsored by various groups throughout the State of Illinois. These improvements are enhanced by the State Revolving Loan Fund (SRF) program that assists some supplies in completing capital development projects needed to accomplish compliance, and through continuing education requirements mandated for certified drinking water operators that result in better operation of water treatment facilities. The length of time that a water supply is out of compliance for reasons other than those that require major capital improvements have also decreased significantly, to not more than one year.

4. The Illinois DPH policy of performing sanitary surveys every two years minimizes the need for a detailed prioritization scheme under the Capacity Development program. Additional prioritization is based on 1) the highest priority, water supplies in non-compliance with the National Primary Drinking Water Regulations, 2) capacity needs the field office identifies during the sanitary survey, and 3) regulatory issues identified by central office.

SDWIS/State was installed at Illinois DPH in November 2004. Loading of site visits into SDWIS is underway to track sanitary surveys and capacity development visits. In addition, compliance tracking will be greatly enhanced, which will improve capacity development efforts.

Illinois DPH also measures the success of the capacity development program through water supply compliance rates. These improvements are also enhanced by continuing education requirements mandated for certified drinking water operators that result in better operation of water treatment facilities. In addition, due to outreach efforts by central office staff, surface water supplies and many ground water supplies are much more aware of their responsibilities under the regulations, which Illinois DPH views as an improvement.