FY2014/2015 PERFORMANCE
PARTNERSHIP AGREEMENT
BETWEEN
ILLINOIS EPA AND REGION 5, USEPA

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

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

Entered into on this 9/26/13

Lisa Bonnett
Director

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Regional Administrator

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I. GENERAL PURPOSE AND CONTEXT

The Federal Fiscal Year 2014/2015 (FY14/15) Performance Partnership Agreement (Agreement) sets forth the mutual understandings reached regarding our state/federal relationship, and identifies the desirable environmental outcomes and performance expectations for the programs funded through the Performance Partnership Grant for the period of October 1, 2013 through September 30, 2015. The parties to this agreement are the Illinois Environmental Protection Agency (Illinois EPA) and Region 5 of the United States Environmental Protection Agency (Region 5). Illinois EPA and Region 5 entered into a separate Illinois Work Plan Agreement, dated February 4, 2013. This agreement contains references to that Work Plan, but does not supersede it. The parties have expressed their intention to update and extend the Work Plan Agreement through Calendar Year 2014.

A. State/Federal Environmental Partnership

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

B. Relationship of Agreement to Grants

Illinois EPA will operate under a Performance Partnership Grant (PPG) in FY2014/2015. The FY14/15 PPA continues the new format used in the FY12/13 PPA, to integrate USEPA Strategic Plan Goals and Objectives into the PPA document and to provide a more user friendly template. The templates attached to this agreement serve as specific work plans for the grants included in the Illinois PPG. The templates contain the three Essential Elements required by Grants Policy Issuance 11-03, and will also be used to report accomplishments on an annual basis. The measures and commitments in the work plans will be reviewed and updated as needed on an annual basis.

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

The parties also recognize that some specific project grants will continue in effect and operate in concert with this Agreement. The FY14/15 federal Performance Partnership Grant to Illinois EPA includes the following programs for which this agreement serves as the program commitment:

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

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

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

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

Congress requires USEPA to negotiate a fair share objective with each state for procurement dollars covering supplies, construction, equipment and services. The current negotiated rates require, to the fullest extent possible, that at least 18 percent of federal funding for prime and subcontracts awarded in support of USEPA programs be made available to businesses or other organizations owned or controlled by socially and economically disadvantaged individuals, including women and historically black colleges and universities, based on an assessment of the availability of qualified minority business enterprises (MBE) and women-owned businesses (WBE) in the relevant market. Accordingly, for any grant or cooperative agreement awarded in support of this agreement, the parties agree to ensure that a fair share objective will be made available to MBEs and WBEs.

C. Joint Planning and Evaluation Process

The parties believe it is important to clearly articulate how all the components of the performance partnership are interrelated and sequenced. We will carry out the following joint planning and evaluation process, a two-year agreement covering FY14/15.

Actions	FY2014	FY2015
Finalize FY14/15 Agreement	September 2013	
Senior Management Mid-Course Meeting	July 2014	
Mid-Course Updates	September 2014	
Illinois EPA Annual Performance Partnership Grant Report	December 2013	December 2014
Region 5 Evaluation of Annual Performance Partnership Grant Report	February 2014	February 2015

Throughout this agreement and in the attached documents, the timeframe is throughout FY2014/2015, unless specific timing/milestones are otherwise noted.

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

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

II. Enforcement and Compliance Assurance

Compliance and enforcement activities to be accomplished during the term of the FY14/15 Agreement are included in the individual media program plans. However, a summary of Region 5 and Illinois EPA roles in compliance and enforcement is helpful.

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

- Apply the most effective use of tools to encourage and maintain the compliance of sources of all sizes. This would include compliance assistance, administrative and/or civil enforcement, and criminal enforcement.
- Use joint up-front planning to coordinate priorities, maximize agency resources, avoid duplication of efforts, eliminate surprises, and institutionalize communication.
- Manage for environmental results which support each Agency's environmental goals and objectives,
- Ensure that compliance and enforcement information is complete, accurate, and timely consistent with Region 5 and Illinois EPA policies.

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

In FY14, Region 5 will be conducting a review of Illinois EPA's Clean Air Act (CAA), and Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA) compliance and enforcement programs. Both Region 5 and Illinois EPA are responsible for ensuring that agreed-upon follow-up actions that result from the review are carried out in a timely and effective manner. Certain actions may be addressed, as appropriate, through program workplans under the PPA.

III. Quality Management Plan

All data reported under this agreement will be quality assured and the Illinois EPA will continue to operate in accordance with its Quality Management Plan (QMP), which was approved by Region 5 on February 28, 2013. The QMP will be effective through February 27, 2018. The QMP encompasses Agency-wide and Bureau-specific QA processes for environmental data operations. The QMP will be updated as needed, and changes will be submitted to Region 5 for approval.

In addition, Quality Assurance Project Plans (QAPPs) will be developed as needed in each Bureau for project specific initiatives. Illinois EPA will continue to approve project-level QAPPs under this performance partnership agreement except for Superfund pre-remedial and remedial programs and the Superfund removal program. Illinois EPA will submit program-level QAPPs to Region 5's Land and Chemicals Division for the Leaking Underground Storage Tank (LUST) and Resource Conservation and Recovery Act (RCRA) Subtitle C inspection programs. U.S. EPA competitive assistance agreements under, but not limited to, the Great Lakes Restoration Initiative (GLRI) and Exchange Network Programs shall require the submission of project-level quality documentation for U.S. EPA review and approval as specified in the assistance agreement terms and conditions.

Region 5 is required to assess the implementation of the approved quality systems as well as extramural agreements which U.S. EPA provides financial assistance. Beginning with the approval of the revised Illinois EPA QMP, Illinois EPA shall submit complete signed electronic (i.e. pdf) copies of all self-approved QAPPs to Region 5 on a quarterly basis to facilitate these assessments. In addition, Illinois EPA will submit an annual letter (by January 31 of each year beginning in 2014) to Region 5 each year which:

- identifies any minor revisions needed and/or incorporated into the QMP during the preceding year;
- confirms that the QMP approved by Region 5 is still in effect; and
- lists all QAPPs, by environmental program, which were self-approved by Illinois EPA during the preceding year.

IV. Dispute Resolution Process

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

A. Informal Dispute Resolution Guiding Principles

Illinois EPA and Region 5 will ensure that program operations:

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

- Pay attention to time frames and/or deadlines and escalate quickly when necessary.

B. Formal Conflict Resolution

There are formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 40 CFR 31.70 outlines the formal grant dispute procedures. There is also an NPDES conflict resolution procedure. Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. When there is no resolution and the two weeks have passed, there should be a comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

V. Reporting

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

Attachment A: Bureau of Air

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
USEPA Strategic Goal: 1 – Taking Action on Climate Change & Improving Air Quality				
USEPA Strategic Objective 1.1: Address Climate Change. Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking appropriate actions				
Work Plan Outputs/Measures/Outcomes – Air Toxics – Toxics & Global Atmosphere				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Work collaboratively to address climate change and reduce greenhouse gas.	Kevin Greene or Jim Ross, Illinois EPA, Melissa Hulting or Erin Newman, EPA	Both Illinois EPA and EPA continue to track and take appropriate measures on national, regional and local levels on climate change. Both agencies have committed to an open exchange of information between the agencies as a top priority.	

USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
USEPA 2011-2015 Strategic Outcomes – Reduce Criteria Pollutants and Regional Haze				
Work Plan Outputs/Measures/Outcomes – Federal Vehicle and Fuels Standards and Certification – Control Strategies				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control strategies such as I/M, OBD, and state fuel programs.	Chris Demeroukas, Chuck Gebhardt, Steve Thorpe, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	VIM The Illinois EPA has an ongoing contract with Applus Technologies Inc. to continue On-Board Diagnostics (OBD) vehicle emissions testing in Illinois' ozone non-attainment areas. This contract provides testing through April 30, 2015. Work to develop I/M SIP-based motor vehicle emissions modeling during 2014 and 2015 for new ozone standards. Continue to work with Region 5 in obtaining guidance from OTAQ concerning compliance with and revisions to 40 CFR Part 51, Subpart S – Inspection/Maintenance Program Requirements.	
		Mike Rogers, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	<u>Fuels:</u> The Illinois EPA submitted a SIP revision to Region V to rescind the State gasoline volatility requirements that were repealed by the Illinois Pollution Control Board. The Illinois EPA will work with Region V to provide any additional information necessary for their processing of the SIP revision request.	

	Work with local Metropolitan Planning Organizations, EPA, and state and federal transportation agencies in future conformity determinations as needed.	Mike Rogers, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will continue its ongoing role as an active participant in the transportation conformity consultation process. It will continue to work collaboratively with the Chicago Metropolitan Agency for Planning and the East West Gateway Council of Governments on future conformity determinations.	
	Continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES.	Mike Rogers, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA Air Quality Planning Section will work on the development of required on-road mobile source emissions estimates and, if necessary, potential control measures for inclusion in SIPs addressing the 2008 8-hour ozone and annual PM2.5 NAAQS.	
	Work on replacement of conformity consultation MOUs, so that states can use the flexibility and be consistent with federal transportation conformity rules.	Mike Rogers, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will be coordinating with the Chicago Metropolitan Agency for Planning, the East West Gateway Council of Governments and the Illinois Department of Transportation to develop either new MOUs or regulations dealing with the transportation conformity consultation requirements.	

	Work with EPA to develop creditable mobile source programs.	Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo EPA	The Illinois EPA completed its Stage II hearings with the Pollution Control Board and will be submitting a SIP amendment in 2013 to stop the implementation requirements and to begin decommissioning. All Chicago area gasoline facilities must decommission their Stage II equipment by the end of 2016.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	The Illinois EPA will continue the Tank Truck Certification program. Over 4,000 gasoline tanker trucks get their annual pressure vacuum vapor recovery test to check for Stage I emissions.	
	Work with EPA to develop and continue voluntary mobile source programs and initiatives.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue chairing the Chicago Area Clean Cities coalition and work to obtain federal grants to provide funding for heavy-duty fleets, taxi companies, and other niche fleets to switch to a clean fuel. In addition, the coalition will continue its outreach to fleets and the general public on the benefits of using propane, natural gas, and electric vehicles, as well as biofuels.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, USEPA	The Illinois EPA will continue the Illinois Alternate Fuels Rebate Program to support AFV purchases and certified conversions for both Illinois fleets and the general public. Outreach activities in coordination with Chicago Area Clean Cities will continue.	
		Darwin Burkhart, Illinois EPA Pamela Blakley & Anthony Maietta, EPA	The Illinois EPA is enhancing the Illinois Green Fleets Program by partnering with Chicago Area Clean Cities in recognizing more "green fleets," conducting comprehensive annual surveys of participating fleets, and providing more outreach and networking opportunities.	

Joint Priority	Continue to support the Midwest Clean Diesel Initiative (MCDI) including the management of state clean diesel grants, active involvement in state clean diesel coalitions, continued support of the Smartway program, and the promotion, generation and implementation of clean diesel funding, programs, projects, and policies.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to seek additional funding and implement projects for the Illinois Clean Diesel Grant Program, especially Congestion Mitigation and Air Quality (CMAQ) Improvement funding.	
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to chair the Illinois Clean Diesel Workgroup, which assists the agency in soliciting projects and conducting outreach.	

Work Plan Outputs/Measures/Outcomes – NAAQS Ambient Air Monitoring				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Operate monitors for NAAQS pollutants, NCore, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP) that meets all quality assurance and quality control regulatory monitoring requirements as stipulated in 40 CFR Part 58, Appendix A and guidance set forth in Quality Assurance Handbook of Air Pollution Measurement Systems Volume II (dated May 2013).	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will submit the annual air monitoring network plan for the next calendar year. The 2014 Illinois EPA monitoring network plan was submitted to Region 5, following a 30 day comment period.	
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Operate all NAAQS, PAMS, NCore monitors and submit the data along with the QA data to the AQS according to required schedule.	
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Certify NAAQS pollutant data, PAMS, NCore and toxics data in AQS and provide documentation according to required schedule.	
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will install and begin operation of the first Near Road Site in the Chicago MSA by January 1, 2014 (as required to approve the 2014 monitoring network plan). Continue planning for the next phase of the near toad sites due Jan 1, 2015. Purchasing any trailer/monitors needed for second site when funding is provided by USEPA.	
		David Bloomberg or his designee, Illinois EPA	Illinois EPA will work to install and begin operation of the first Near Road Site in the Chicago MSA by January 1, 2014. Should the	

		Loretta Lehrman, Marta Fuoco, EPA	January 1, 2014 deadline be missed, Illinois EPA will submit to USEPA a new schedule with milestones and completion dates for this required site. Illinois EPA will continue planning for the next phase of the near road sites due Jan 1, 2015. Purchasing any trailer/monitors needed for second site when funding is provided by USEPA.	
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Install lead monitor at Mittal Steel as required by 40 CFR Part 58 Appendix D 4.5. Install special purpose lead monitor at Johnson Controls as approved in the 2013 monitoring network plan.	
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Install and operate a continuous PM2.5 monitor at the Bondville NCore site as required in the 2013 network plan.	
	Illinois EPA shall continue to coordinate the Illinois Ambient Air Monitoring Network with Cook County Department of Environmental Control	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide technical directives and assistance to Cook County Department of Environmental Control, submit monitoring data collected by Cook County, include Cook County monitoring network in the annual network plan.	

	Illinois EPA shall submit and implement a formal corrective action plan to USEPA in response to any Technical Systems Audit findings and or/recommendations	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA		
	Illinois EPA shall demonstrate compliance with new FEM (Forum on Environmental Measurements) policy http://www.epa.gov/fem/index.htm	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA		

	Attend the annual Region 5 State/Local/Tribal Air Monitoring Contacts meeting, Participate in the monthly S/L/Tribal monitoring calls. Attend the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference if they are held.	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will attend the annual Region 5 Contacts meeting when held in Illinois. Attendance at all out-of-state conferences will occur only if out-of-state travel is approved on the State level and funding is available.	
	Reporting – Illinois EPA and EPA will continue to participate in bi-weekly conference calls between the Illinois EPA Air Monitoring Section Manager (or his or her designee) and EPA AMAS Section Chief (or his or her designee); unless an alternative schedule is agreed to by both parties.	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will participate in conference calls with EPA to discuss updates on training, staffing, and equipment replacement and purchases.	
	Equipment Replacement	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide regular updates in bi-weekly calls. Illinois will discuss equipment replacement strategy with EPA as needed. EPA recognizes that this is an evergreen document that will be revised from time to time to reflect funding, regulatory changes, and unexpected events; e.g., damage to a monitoring site due to tornado, hail, rain, vandalism, etc.	

Work Plan Outputs/Measures/Outcomes – Attainment Planning and Maintenance				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to review air quality data and will take appropriate actions to address new violating areas.	
	As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA submitted a Maintenance Plan and redesignation request for the Chicago area for the $PM_{2.5}$ annual standard based on air quality data from 2006-2008. EPA published its final clean data finding which satisfies the obligation to submit an attainment demonstration for Chicago. On August 7, 2013, USEPA published the proposed redesignation in the Federal Register.	
	Continue to implement 1997 $PM_{2.5}$ and 8-hr ozone SIPs.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement the regulations developed for the $PM_{2.5}$ and 8-hour ozone NAAQS.	
	Submit any outstanding 1997 $PM_{2.5}$ SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit any outstanding 1997 $PM_{2.5}$ SIP elements as necessary.	

	Prepare recommendations on designations for revised NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by USEPA.	
	Facilitate implementation of NOx and SO2 requirements under Transport Rule, pending court decisions on the Cross State Air Pollution Rule (CSAPR).	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will facilitate implementation of CAIR and any replacement rule, as required and appropriate, by affected sources in Illinois.	
	Submit SIPs for the lead NAAQS.	David Bloomberg, Illinois EPA, Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit attainment SIPs for areas designated nonattainment for the lead NAAQS. As of July, agreement has been reached with stakeholders & USEPA; regulations will be proposed to the Board shortly as a fast-track rulemaking.	
	Consult with EPA, as necessary, to finalize area designations for the NO_2 primary and SO_2 primary NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations for the revised NO2 and SO2 NAAQS as necessary. The Illinois EPA will continue to work with EPA to finalize the area designations.	

	Conduct public notifications and education efforts, including reporting air quality forecasts and current conditions for ozone and particle pollution.	Kim Biggs, Illinois EPA Michael Compher, EPA	The Illinois EPA maintains the air quality notification system, EnviroFlash, for six regions in Illinois, providing daily air quality forecasts and air quality alerts. The Agency, in conjunction with Illinois Partners for Clean Air has been increasing enrollment in the notification system since 2009 with more than 6,500 current subscribers. Public education and outreach continues to expand with a year-round media campaign targeting on-road vehicles and energy efficiency. The campaign includes various media (radio, television, outdoor, digital and online) which continues in State Fiscal Year2015. The Illinois EPA and Illinois Partners for Clean Air continue to encourage residents, businesses and government entities to sign up for air quality forecasts through EPA's EnviroFlash program online and through outreach events.	
	Assist with outreach and capacity building for minority, low-income and indigenous communities to improve understanding of and engagement in regulatory and permitting processes.	Brad Frost, Illinois EPA Lara Lasky, EPA	Utilize the Illinois EPA Environmental Justice Policy. Notify the Environmental Justice Officer of projects in Environmental Justice areas. Participate in the Illinois EPA Environmental Justice Advisory Group. Work cooperatively with USEPA on EJ issues. Meet all requirements associated with the Geneva Settlement, Administrative Complaint 13R-10-R5.	
	Develop and submit SIP revisions, if desired, to remove active Stage II gasoline vapor recovery programs	Darwin Burkhart, Illinois EPA, Pamela Blakley, Frank Acevedo EPA		
	Implement mobile source control strategies (such as I/M programs and transportation control measures) on time and consistent with SIP commitments.	Chris Demeroukas, Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo EPA		
	Prepare and submit data for the 2014 National Emissions Inventory.	David Asselmeier or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will submit data for the 2014 National Emissions Inventory by December 2015.	

	Develop attainment demonstrations for SIPs for SO2 nonattainment areas and conduct other SO2 air quality planning in accordance with EPA rules and guidance.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will develop attainment demonstrations and conduct other SO2 air quality planning in accordance with EPA rules and guidance, when such rules and guidance are finalized.	
Work Plan Outputs/Measures/Outcomes – Regional Haze – Attainment Planning and Maintenance				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Implement BART requirements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement BART emission limits through federally enforceable permits and its MPS/CPS rules	
	Submit any outstanding Regional Haze SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will work with LADCO and other Midwestern states to prepare and submit a mid-course review of the progress goals established in the Regional Haze SIP.	

Work Plan Outputs/Measures/Outcomes – Permitting				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Provide timely review of construction permits issued compliant with Greenhouse Gas BACT.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	PSD/NSR Permitting: Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, will notify EPA of any GHG BACT applications during the monthly conference calls, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit.	
	Target issuance of major PSD/NSR permits within one year of receiving a complete permit application.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to issue construction permits and PSD and NSR permits as expeditiously as practicable. The Illinois EPA will process new applications (received after October 15, 2012) for PSD permits recognizing applicable EPA guidance on timely processing of PSD permits.	
	Issue NSR permits consistent with CAA requirements and enter BACT/LAER determinations in the RACT/BACT/LAER Clearinghouse (RBLC).	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to timely submit data to the RACT/BACT/LAER Clearinghouse.	
	Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including "the application accepted date" and "the permit issuance date" into the RBLC national database.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will provide timeliness data.	
	PSD-delegated states coordinate with EPA to ensure that Endangered Species Act consultations are handled in a timely manner.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	As related to consultation under the federal Endangered Species Act (ESA), consultation with the USFWS for the planned issuance of permits for proposed projects will be performed by EPA, working directly with applicants for proposed projects. The Illinois EPA will instruct applicants to directly contact EPA to initiate EPA's ESA review and consultation. The Illinois EPA and EPA will attempt to coordinate their respective roles in permitting so that ESA consultation is handled in an efficient and timely manner and that the ESA consultation process does not unduly delay the issuance of PSD permits.	

	Provide PSD/NSR permit applications to EPA prior to the start of the public comment period.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit. The Illinois EPA and EPA will continue to hold monthly permit program calls and New Source Review permit calls for issue resolution and information sharing.	
	Provide PSD application tracking data to EPA on a quarterly basis.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will provide to EPA quarterly updates on agreed to fields for PSD application tracking data being maintained by EPA, including information on each permit milestone and permit issuance.	

USEPA Strategic Goal: 1 – Taking Action on Climate Change & Improving Air Quality				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants. USEPA 2011-2015 Strategic Outcomes – Reduce Criteria Pollutants and Regional Haze				
Work Plan Outputs/Measures/Outcomes – Air Toxics				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Emission Inventory: (1) Develop HAP emission inventories for submission to EPA's National Emissions Inventory (NEI) database; (2) submit data for the integrated HAP emissions inventory; (3) Quality assure, validate, and revise NEI data using EIS; and (4) Participate in Regional emission inventory workgroup conference calls.	David Asselmeier or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	The Illinois EPA will continue to provide appropriate and accurate data and work together with EPA to review and ensure the quality of data.	
	Implement delegated Section 112 of the Clean Air Act, as appropriate.	David Bloomberg, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA continues to be an active participant in the implementation of standards under Section 112 of the Clean Air Act (e.g., MACT, area source NESHAPs). Illinois EPA has delegated authority for implementation of these regulations. Illinois EPA will continue to provide outreach, education, and other assistance to affected sources primarily through the Small Business Environmental Assistance Program.	
	Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in quarterly Region 5 conference calls and annual air toxics meetings as appropriate.	
	Review and analyze NATA data, as available. Region 5 will provide timely access to and assistance to the review of the NATA data.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in the review process for NATA.	

	Participate as appropriate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA remains open to discussions involving its participation in a Regional Air Toxics Priority Project and/or addressing High Risk Point Sources as identified through NATA. Illinois may participate to the extent appropriate, in consideration of available resources, through emissions verification, data review and site visits.	
	Great Lakes Air Deposition Program: Address the deposition of persistent bioaccumulative toxics (PBTs) in the waterways of the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.	David Bloomberg or his designee, Illinois EPA Erin Newman, EPA	Illinois EPA will continue to work with USEPA to address the deposition of PBTs in the waterways of the Great Lakes Region.	

USPEA Strategic Goal: Enforcing Environmental Laws				
USEPA Strategic Objective 5.1: Enforcement Environmental Laws. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.				
Work Plan Outputs/Measures/Outcomes – Monitoring				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
	Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2013) Implementation of the final CMS plan will begin the upcoming federal fiscal year, as it pertains to non-Title V sources. The CMS plan should meet EPA's September 10, 2010 CAA Stationary Source CMS policy. (October 1, 2013).	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, Joseph Koester, EPA	The Illinois EPA will continue to submit the Illinois CMS plan to EPA and implement it as approved by EPA. The CMS source category and frequency flags in AFS will be completed for non-Title V major source universe by the state by October 15, 2013. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan. (January 1, 2014)	
	Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's March 31, 1988 Revised Asbestos NESHAP Strategy. (Ongoing)	Ron Robeen or his designee, Illinois EPA Nathan Frank, EPA	The Illinois EPA will continue to inspect sources/landfills in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy.	
	Track State Review Framework recommendations made by EPA to the states until completion and provide updates to USEPA, as it pertains to non-Title V sources. (Quarterly)	Eric Jones or James Morgan, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	
	Respond to citizen complaints including those referred from EPA.	Ron Robeen or his designee, Illinois EPA, Nathan Frank, EPA	The Illinois EPA will continue to respond to citizen complaints and inspections will be conducted where necessary.	

Work Plan Outputs/Measures/Outcomes – Enforcement – Reporting				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
	Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the current Air Facility System (AFS) Information Collection Request (ICR). Ensure data is complete, accurate and timely consistent with EPA policies and ICR, as it pertains to non-Title V sources. Such language should be included in the written agreement between the State and EPA. (60 day reporting as required by ICR)	Eric Jones or James Morgan, Illinois EPA Rochelle Marceillars, Joseph Koesters, EPA	The Illinois EPA will submit MDRs in accordance with the current AFS ICR.	
	Asbestos notification information, compliance evaluations and enforcement activities will be reported alphabetically by owner or operator to the EPA by the State. (Annually)	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will report the number of Asbestos notifications received and will provide EPA with the number of inspections performed and enforcement actions taken, including penalties assessed.	

Work Plan Outputs/Measures/Outcomes – Enforcement				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
	Compliance and Enforcement Activities	Eric Jones or James Morgan, Illinois EPA Nathan Frank, , Rochelle Marceillars, Daneshia Hamilton EPA	EPA and Illinois EPA will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, federal and state HPV cases, data management and reporting, and efforts to resolve violations, as it pertains to non-Title V sources. For state lead HPV cases unaddressed over the 270 day timeframe, EPA will provide notice to Illinois EPA of EPA's intent to take or maintain the lead for the case and will discuss the status of the state case with the Illinois EPA. Any data issues will also be discussed on the conference calls. (Monthly)	
	HPV sources listed on Headquarters Watch List, as it pertains to non-Title V sources - the Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQs OECA, Region 5 EPA and/or Illinois EPA. (Quarterly)	Eric Jones, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will continue to provide to EPA the status codes and explanations for the HPV sources listed on Headquarters' Watch List as it pertains to Non-Title V sources.	

	State will conduct its enforcement activities in accordance with the December 22, 1998, EPA Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, October 25, 1991, Clean Air Act Stationary Source Civil Penalty policy and March 31, 1988, Revised Asbestos NESHAP Strategy, as it pertains to non-Title V sources. (Ongoing)	Eric Jones or James Morgan, Illinois EPA Nathan Frank, EPA	The Illinois EPA will continue to conduct enforcement activities in accordance with the policies identified in the Template Measures.	
	Where it has delegation, the State will copy Region 5 Air Enforcement on all Part 61 or Part 63 applicability determinations that it issues at the time of issuance.	James Morgan, Illinois EPA, Nathan Frank, EPA		

APPENDIX A

Title V

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

USEPA Strategic Goal: 1 Clean Air & Global Climate Change				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities or Commitments**	**Performance Partnership Grant Status/Progress**
	Target of the issuance of significant power plant and refinery Title V permits.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	Recognizing that the Work Plan commitments have the highest priority and the limitations on processing the Title V power plant permits that are under appeal, to the extent practicable, the Illinois EPA will then prioritize the issuance of significant power plant and refinery Title V permits.	
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1: Protect Human Health				
Work Plan Outputs/Measures/Outcomes – Carbon Sequestration				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
Environ-mental Justice	Screen all incoming permit actions/applications for potential Environmental Justice	Ken Page, Illinois EPA	In accordance with the Environmental Justice (EJ) Public Participation Procedure report all proposed permitting actions for facilities located in a potential EJ area as determined by Illinois EPA's screening tool to the EJ Officer for further research.	

Attachment B: Bureau of Land

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
Strategic Goal 3: Cleaning up Communities & Advancing Sustainable Development				
Strategic Objective 3.1: Preserve Land				
Work Plan Outputs/Measures/Outcomes – Hazardous Waste Management				
Grant Code CFDA 66.801	**Template Measures**	**Contacts** Gary Victorine-EPA	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
	Number of hazardous waste facilities with new or updated controls.	Rob Watson	**USEPA**: % of hazardous waste management treatment, storage, and disposal facilities with controls in place **Illinois EPA**: Currently, the % of hazardous waste management treatment and disposal facilities with controls in place is 100%. The % of hazardous waste management treatment, storage, and disposal facilities with controls in place will be updated, as needed.	
		Steve Nightingale	**USEPA**: Review and reissue RCRA Part B operating permits in response to renewal applications. **Illinois EPA:** Anticipate public noticing the draft permit for Detrex (ILD074424938) in October 2013. Anticipate issuing final permits for 3 sites in FFY14: Honeywell (ILD006278170) Safety-Kleen (Elgin) (ILD000805911) Detrex (ILD074424938) Anticipate public noticing the draft RCRA permits for 3 facilities in FFY2015: Century Env. Resources (ILD099215303) – Jan 2015 Clean Harbors Recycling Chicago (ILD005450697) – April 2015 Envirite of Illinois (ILD000666206) – May 2015	

	Amount of hazardous waste managed at commercial treatment/disposal facilities annually	Hope Wright	Report tons of hazardous waste managed at commercial treatment/disposal facilities	
	% of Resource Conservation and Recovery Act (RCRA) regulated & inspected sites will be in full compliance, under an accepted compliance commitment agreement, or referred for formal enforcement within 180 days of inspection date	Brian White	Report Significant Non-Compliers (SNC) rate within compliance monitoring program.	
		Greg Richardson	Assess and report environmental benefits that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc.	
	Ensure proper closure and post-closure of all inactive hazardous waste landfills	Rob Watson	Report % of Government Performance Results Act (GPRA) Baseline Post-Closure Universe facilities brought under control. **Illinois EPA**: Currently 99% (55 of 56) of GPRA Baseline Post-Closure Universe facilities have been brought under control. Illinois EPA will continue to work toward bringing 100% (56 of 56) of GPRA Baseline Post-Closure Universe facilities under control.	
	Ensure groundwater monitoring at permitted facilities that treat, store and dispose of hazardous waste.	Terri Myers	**USEPA:** Report % of hazardous waste management facilities conducting detection monitoring and report % of hazardous waste management facilities conducting assessment/compliance monitoring. **Illinois EPA:** Currently 28% of hazardous waste management facilities are conducting detection monitoring. Currently 26% of hazardous waste management facilities are conducting assessment/compliance monitoring. The % of hazardous waste management facilities conducting detection monitoring or assessment/compliance monitoring will be updated as needed.	

	Routine compliance monitoring activities	Todd Marvel	Conduct 17 Compliance Evaluation Inspections (CEI) at Treatment, Storage, Disposal Facilities (TSDFs)	
		Todd Marvel	Conduct & Report Comprehensive Groundwater Monitoring Evaluations (CME) at TSDFs	
		Todd Marvel	Conduct 13 Operation & Maintenance (OAM) inspections at TSDFs	
		Todd Marvel	Conduct Compliance Schedule Evaluation (CSE) at TSDFs as needed.	
		Brian White	Conduct & Report Financial Record Reviews (FRR) at TSDFs	
		Todd Marvel	Conduct & Report Non-Financial Record Reviews (NRR) at TSDFs & generators.	
		Todd Marvel	Conduct CEIs for large quantity generators (LQG) at 20% of LQG universe (140).	

		Todd Marvel	Conduct & Report CEIs conducted at small quantity generators.	
		Todd Marvel	Conduct & Report CEIs conducted at conditionally-exempt small quantity generators (CESQGs)	
		Todd Marvel	Conduct & Report CEI for transporters	
		Todd Marvel	Conduct & Report CEI for non-handlers & generator status not determined	
	Non-routine compliance monitoring activities	Todd Marvel	Conduct & Report # of citizen complaints and investigations	
		Todd Marvel	Conduct & Report follow-up inspections (FUI)	
		Todd Marvel	Conduct & Report case development inspections	

		Todd Marvel	Conduct & Report focused compliance inspections	
	RCRAInfo Data Management	Todd Marvel	Illinois EPA will timely enter all RCRAInfo data fields for which it is the State implementer of record (IOR). The IOR tables in RCRAInfo define the fields for which Illinois is the owner and has data entry responsibilities. Data will be entered within one month of the completion of any recordable RCRA program activity. Illinois EPA will also maintain and update implementer owned codes in the RCRAInfo look-up tables, will keep the RCRA program universe records current, and will submit biennial report files in accordance with timeframes established by EPA's Office of Resource Conservation and Recovery.	
	Oversight Arrangement	Todd Marvel	Illinois EPA will: a) Conduct an annual mid-year program meeting; b) Conduct at least quarterly program enforcement conference calls; c) Conduct joint inspections as needed or requested; and d) Investigate and respond to inquiries from EPA concerning facilities that do not appear to have been timely and/or appropriately addressed under Illinois' enforcement program. This will include at least one annual meeting between EPA and Illinois EPA to discuss the file audit results.	
Work Plan Outputs/Measures/Outcomes – Underground Injection Control Program				
Grant Code CFDA 66.433	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
		Bur Filson	Class I Inspections: Illinois EPA will conduct one inspection at each of the 3 Class I facilities annually covering the 4 Class I wells in the State's inventory.	

		Bur Filson	Class I File Reviews: Illinois EPA will conduct monthly compliance reviews of required reports from operators (includes monthly monitoring reports and well log data).	
		Bur Filson	Class I MITs (National Program Measure): Illinois EPA will ensure that 100% of Class I wells that lose MI are returned to compliance within 180 days. (SDW-7)	
		Bur Filson	Review and process any new and renewal permit applications, as well as any permit modifications requests, in a timely manner.	
		Bur Filson	Class V Closures (National Program Measure): At the first year of this agreement, Illinois EPA has closed 4 high priority Class V wells found within Illinois wellhead protection areas. Illinois EPA will use informal methods and enforcement including, but not limited to, violation notices and compliance commitment agreements, to close Class V wells in sensitive areas. Illinois EPA will report the number of closed Class V wells and notify USEPA regarding progress in closing other Class V wells within sensitive areas in Illinois. Illinois EPA will continue efforts to review other wells as seemed appropriate per the state's criteria until such time as EPA and Illinois EPA agree on additional activities.	
w		Bur Filson	Illinois EPA will provide updates and add new data to the national UIC database at least twice per year, April 15 and October 15, to satisfy the reporting needs formerly met through the submission of the 7520s and inventory.	
		Bur Filson	Illinois EPA will continue to add new and update existing well records in the national UIC database at least twice per year, by April 15 and October 15. The transfer of all data presently maintained in an electronic format has been completed.	

		Bur Filson	Carbon Sequestration (National Program Indicator): Illinois EPA will carry out the following activities as resources allow. Illinois EPA will collaborate with USEPA on Class VI permits and on regional and national issues as they evolve, particularly in relation to primacy, regulatory developments, and policy changes. Illinois EPA and USEPA will facilitate interaction and exchange between key stakeholders such as DOE-funded research groups, other state and federal regulators, and environmental groups through avenues such as meetings and workshops to expand regional experience with and expertise on carbon sequestration.	
Strategic Objective 3.2: Restore Land				
Work Plan Outputs/Measures/Outcomes – Resource Conservation & Recovery Act (RCRA)				
Grant Code CFDA 66.801	**Template Measures**	**Contacts** Jose Cisneros-EPA	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
	Number of 2020 GPRA baseline facilities with human exposures under control	Rob Watson	Take necessary actions to help Region 5 to achieve FY14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for. Illinois EPA will perform 2 additional CA725 determinations for a total of 110 of 126 (87%) in FFY14. Illinois EPA will perform 2 additional CA725 determinations for a total of 112 of 126 (89%) in FFY 15.	
	Number of 2020 GPRA baseline facilities with migration of contaminated groundwater under control	Terri Myers	Take necessary actions to help Region 5 to achieve FY 14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for. Illinois EPA will perform 2 additional CA750 determinations for a total of 93 of 126 (74%) in FFY14. Illinois EPA will perform 2 additional CA750 determinations for a total of 95 of 126 (75%) in FFY15.	
	Number of 2020 GPRA baseline facilities with remedy construction complete	Rob Watson	Take necessary actions to help Region 5 to achieve FY14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for.	

			Illinois EPA will perform 2 additional CA550 determinations for a total of 71 of 126 (56%) in FFY14. Illinois EPA will perform 2 additional CA550 determinations for a total of 73 of 126 (58%) in FFY15.	
		Todd Marvel	Require investigation and cleanup of releases at hazardous waste management facilities.	
		Brian White	Financial Record Reviews (FRR), Illinois EPA will conduct financial assurance reviews to verify compliance status with the RCRA financial assurance requirements.	

Strategic Goal 5: Enforcing Environmental Laws				
Strategic Objective 5.1: Enforce Environmental Laws				
Work Plan Outputs/Measures/Outcomes – Office of Solid Waste and Emergency Response				
Grant Code CFDA 66.605	**Template Measures**	**Contacts** Mardi Klevs-EPA	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
	TSCA Activities	Beth Unser	Conduct routine TSCA inspections statewide as mutually agreed. Illinois EPA will perform 26 PCB inspections for FY14/15. Inspections will be targeted according to joint inspection priorities determined by Illinois EPA and USEPA. At least 5 inspections will be conducted at natural gas pipeline compressor stations. Natural gas inspections will be done at both interstate and local distribution companies.	
		Beth Unser	Submit inspection reports in a timely manner, including quarterly spreadsheet of the inspections conducted. Each inspection report will include mention as to whether the area where the inspection took place meets the State's environmental justice criteria.	
		Beth Unser	Will provide oversight of PCB remediation activities by site visits or written or verbal communication.	
		Beth Unser	Continue participation in USEPA's digital inspector program by gathering inspection data electronically and will update equipment and software as funding allows.	
		Beth Unser	Inspectors will attend annual training.	

Work Plan Outputs/Measures/Outcomes – Enforcement and Rules Development/Authorization				
Grant Code CFDA 66.801	**Template Measures**	**Contacts** Gary Victorine-EPA	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
	Enforcement and Rules Development Activities	Dan Merriman	Report number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases.)	
		Todd Marvel	Illinois EPA will review and ensure the accuracy of the adoption of RCRA rules promulgated by USEPA in a timely manner.	
		Todd Marvel	Illinois EPA will submit Authorization Revision Application (ARA) 9, which will include all applicable RCRA rules promulgated to date.	
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1: Protect Human Health				
Work Plan Outputs/Measures/Outcomes – Carbon Sequestration				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Activities**	**Performance Partnership Grant Status/Progress**
Joint Priority	Volume of CO2 sequestered through injection as defined by the UIC Final Rule.		Illinois EPA will continue to participate in the Midwest Geological Sequestration Consortium (MGSC).	
Joint Priority	Number of permit decisions during the reporting period that result in CO2 sequestered through injection as defined by the UIC Final Rule.		USEPA currently has Class VI permitting authority. Illinois EPA will continue to collaborate with USEPA on carbon sequestration issues.	

Environ-mental Justice	Screen all incoming permit actions/applications for potential Environmental Justice issues.	Ken Page	In accordance with the Environmental Justice (EJ) Public Participation report all proposed permitting actions for facilities located in potential EJ areas as determined by Illinois EPA's screening tool to the EJ Officer for further outreach.	

Attachment C: Bureau of Water

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.1: Water Safe to Drink				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Dave McMillan	In FY2014 and FY15, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Dave McMillan	In FY2014 and FY15, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	In FY2014 and FY15 minimize risk to public health through source water protection for 50% of CWSs (i.e. "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	

SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Dave McMillan/Rick Cobb	By FY2014 and FY15, minimize risk to public health through source water protection for 42% of the population served by CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	
SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment Rules.	Dave McMillan/Rick Cobb	In FY2014 and FY15, 90% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules	
SDW-SP2	By FY2012, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months).	U.S. EPA, Region 5	This measure is generated by U.S. EPA through a database query and calculation with a target of 95% person months of the affect population receiving compliant water.	

SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).	Gary Bingenheimer	The Illinois EPA will maintain a pace of loan program activity that maximizes the availability of low interest financing for public water supply projects in Illinois.	
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative)	Gary Bingenheimer	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.3 Water Safe for Swimming				
Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
SS-1		Amy Dragovich	Combined Sewer Overflow (CSO) Permits – Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable. Illinois EPA commits to requiring monitoring and then determining if water quality standard limits are necessary on blended flows.	

		Amy Dragovich	Illinois EPA will utilize the permit language pertaining to all wet weather discharges, as approved by USEPA, to assure compliance with Clean Water Act requirements.	

		Amy Dragovich	Illinois EPA will provide a pre-public notice permit for the City of Chicago CSO permit upon issuance of the MWRDGC permits and issue a final permit within 90 days of issuing MWRD permits for Stickney, Northside, and Calumet WRPs, unless a public hearing is necessary. If a public hearing is necessary, the permit will be provided within 90 days of the hearing date.	

SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated in to an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: Implementation of an approved Long Term Control Plan (LTCP); or Implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.	
SS-1 + Clean Water Action Plan		Amy Dragovich	Once the schedule is finalized Illinois EPA will send an update to Region 5 by the end of every month. Illinois EPA will update USEPA CSO LTCP status spreadsheet, internal monthly reporting, and to track progress toward meeting goals under the CSO Control Plan Policy.	

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis				
Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative)	Gary Bingenheimer	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the "green project reserve".	

SP-10	Measure W	Amy Walkenbach	Measure W tracks watersheds where water quality conditions have improved by using a watershed approach. One of the primary purposes of this measure is to model and demonstrate the effectiveness of the watershed approach. Illinois EPA has previously submitted Jelkes Creek, Dutchman's Creek, Governor Bond Lake and Pittsfield watersheds. We now submit Indian Creek-Lake County and Lake Vermilion for consideration under this measure.	
	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained (cumulative.)	Amy Walkenbach	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database.	
WQ01a	Number of numeric water quality standards for total nitrogen and for total phosphorus adopted by States & Territories and approved by USEPA, or promulgated by EPA, for all waters within the State or Territory for each of the following waterbody types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280.)	Bob Mosher	The Illinois EPA will continue to work with Region 5 to adopt nutrient water quality standards.	

		Bob Mosher	Illinois EPA will continue participation in the Regional effort to develop nutrient criteria guidance through its membership in the Regional Technical Assistance Group.	
		Bob Mosher	Coordinator will work with the Science Committee of the Nutrient Standards Workgroup.	

WQ26	Number of states and territories implementing nutrient reduction strategies by (1) setting priorities on a watershed or state-wide basis, (2) establishing nutrient reduction targets, and (3) continuing to make progress (and provide performance milestone information to EPA) on adoption of numeric nutrient criteria for at least one class of waters by no later than 2016	Bob Mosher Marcia Willhite	Statewide Nutrient Reduction Strategy—Illinois EPA, in collaboration with the University of Illinois, Illinois Department of Agriculture and a broad range of stakeholders, will develop a statewide nutrient reduction strategy, focused on in-state water quality impairments as well as contribution to Gulf of Mexico hypoxia, based on the 2011 USEPA framework. A final strategy will be provided to Region 5 by August 2014. Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates from mutual agency agreement, as needed each summer if there has been slippage to major milestones in the plan. Illinois EPA will commit to the following timeline: Nomination & selection of members – January-March 2015 Committee convenes & conducts review – April 2015-September 2016 Committee presents determination(s) – October 2016 Outreach & discussion among stakeholders – November 2016-2017 Illinois EPA develops rulemaking package – April-July 2017 Illinois EPA files rule(s) with the Illinois Pollution Control Board – August 2017	

WQ03a	Number and national percent of States & Territories that within the preceding 3 year period, submitted new or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.	Bob Mosher	Consistent with the requirements of 40 CFR 131 20 (c) where Illinois EPA proposes new or revised criteria that differ from USEPA's recommended criteria or for parameters where there are no USEPA recommended criteria, Illinois EPA will provide technical documentation for the decision it makes with respect to selecting data for use in calculating the criteria. Where USEPA national criteria exist, Illinois EPA will announce in its annual program plan, beginning in FY13, what standards, such as ammonia, human health narrative, bacteria, it will seek to update through the Illinois Pollution Control Board. By September 30, 2013, Illinois EPA and U.S. EPA will discuss Illinois EPA's review of adjusted standards and site specific criteria approved by Illinois PCB since January 2000 to identify those which should have been submitted to USEPA for its approval under Section 303(c) of the Clean Water Act. By October 31, 2013, Illinois EPA and EPA will develop a plan to bring such regulatory reliefs into compliance with the Clean Water Act requirements. Illinois EPA commits to submitting ammonia criteria rulemaking package to the Illinois Pollution Control Board by December 2016. Illinois EPA will discuss with U.S. EPA the rationale to support Illinois EPA's position on how the adjusted standards can get removed from Illinois' WQS if they have not officially expired.	
	Human Health Criteria	Bob Mosher	Illinois EPA will propose updated human health criteria within the triennial review period beginning in FY14.	

	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Bob Mosher	Illinois EPA will propose an update for bacteria standards to the Illinois Pollution Control Board by December 2015.	
	Great Lakes Initiative Clearinghouse	Bob Mosher	If any criteria applicable to the Great Lakes are updated, Illinois EPA will send USEPA completed criteria templates and fact sheets for upload to the GLI Clearinghouse.	
	Endangered Species Act Consultation	Bob Mosher	Illinois EPA will assist USEPA in coordinating with U.S. Fish and Wildlife Service on draft and final new and revised water quality standards.	
	Lower Des Plaines River & Chicago Area Waterway UAA	Roy Smogor Bob Mosher Scott Twait	Illinois EPA will continue to support completion of the rulemaking and will actively work with USEPA to address concerns raised on proposed rules and U.S. EPA disapproved rules. Within 18 months of USEPA's action on Sub-docket D, the Agency will submit a rulemaking package to the Board addressing all of EPA's disapproval items.	
	Status of Illinois' monitoring strategies and other initiatives	Gregg Good	Ambient Water Quality Monitoring Network – Illinois EPA will conduct monitoring activity at 146 ambient stream stations nine times annually (approximately every six weeks).	

		Gregg Good	Intensive Basin Surveys – Illinois EPA will conduct Intensive Basin Survey monitoring activities at approximately 125-140 sites annually. Major river basins planned to be monitored in FY14 include the Green, Upper Illinois, Vermilion (Illinois River), Mississippi Central, Mississippi North Central, Bear, Mississippi South, and Cache. Major river basins planned to be monitored in FY15 include the Mississippi North, Apple/Plum, Kankakee, Iroquois, Mackinaw, Spoon, Mississippi South Central, Wood/Piasa, Saline, and Ohio River tributaries.	
		Gregg Good	Facility-Related Stream Surveys – Illinois EPA will conduct up to five (5) facility-related stream surveys annually	
		Gregg Good	Ambient Lake Monitoring Program – Illinois EPA will conduct monitoring activity at approximately 35-45 inland lakes annually.	
		Gregg Good	Volunteer Lake Monitoring Program (VLMP) – Illinois EPA will conduct VLMP Tier 1 monitoring at approximately 150-160 inland lakes and Tier 2 monitoring at approximately 40-50 inland lakes annually.	
		Gregg Good	Fish Contaminant Monitoring Program – Illinois EPA continues to work cooperatively with the IDNR, IDPH, and IDOA pursuant to the protocols established by Illinois' Fish Consumption Monitoring Program to collect and analyze fish from inland lakes, streams, and Lake Michigan for the purpose of issuing consumption advisories and assessing CWA fish consumption use attainment. The number of samples analyzed through Illinois EPA laboratory will be reported on annually.	

		Gregg Good	Special Surveys – Special surveys are periodically conducted on an as-needed basis to meet lakes, NPS/watershed, permitting, or other program needs. The number and brief summaries of special surveys conducted by the Agency will reported on an annual basis.	
		Gregg Good	Lake Michigan Monitoring Program – Illinois EPA will conduct lake Michigan near shore survey monitoring at 25 probabilistically-based sites on an annual basis. If time and resources allow, 2-3 Lake Michigan harbors, and 3-4 public water supply intake locations, will be monitored annually.	
		Gregg Good	Wetland Assessments – Upon completion of the Wetland Index of Biotic Integrity (w-IBI) developed by the Illinois Natural History Survey (INHS), the Illinois EPA agrees to work with Illinois NHS and Region 5 to see how best to incorporate the w-IBI into a methodology to assess attainment of wetland use(s) in the 2016 Section 305(b) report.	
		Gregg Good	National Aquatic Resource Surveys – Under Joint Funding Agreement with the Illinois-USGS, Illinois EPA will participate in the second year of the National Rivers and Streams Assessment with monitoring to take place in Summer 2014. Illinois EPA will make a commitment by approximately July 2014 whether it will participate in the National Coastal Condition Assessment with monitoring to take place in Summer 2015.	

		Gregg Good	STORET – Illinois EPA will continue to submit regular updates of water quality information to STORET via the AWQMS database.	
		Gregg Good	Water Quality Monitoring Strategy Development 2013-2018 – In developing the 2013-2018 Illinois Water Monitoring Strategy, consideration will be given to comments provided by USEPA on Illinois EPA's previous strategy; new state and federal priorities; availability of Illinois EPA staff and financial resources; technical capabilities; etc. Region 5 and Illinois EPA will work together to develop a draft of the strategy which will be submitted to USEPA for review and comment by May 30, 2014. USEPA's review comments will be provided back to Illinois EPA by July 31, 2014. The final strategy will be developed by September 30, 2014.	
		Gregg Good Roy Smogor	By July 15, 2013, Illinois EPA will have been provided with a final report developed in conjunction with Midwest Biodiversity Institute (MBI) and Region 5 that provides an assessment of the resources necessary to run a Level 4 biological assessment program. By December 31, 2013, Illinois EPA will inform Region 5 whether it will fully commit to development of a TALU-based monitoring assessment, and implementation program in Illinois. If the Illinois EPA commits to doing so, a plan of action with milestones will be drafted and forwarded to Region 5 by March 31, 2014.	

		Gregg Good Amy Walkenbach	Illinois EPA will implement procedural and scheduling changes in 2013 that will result in a submittal of the 2014 305(b) report, including a populated Assessment Database and geo-reference data to Region 5 for approval by April 1, 2014	
	303 (d) List Development	Amy Walkenbach	The final 2014 303(d) List will be submitted to USEPA on by April 1, 2014. The 2016 draft 303(d) List will be provided to Region 5 and the public by May 2015 for review and comment with a hearing in July 2015. The final 2016 303(d) List will be submitted to USEPA by April 1, 2016	
			Illinois EPA will work with U.S. EPA in FY 2015 to develop a plan that is consistent with EPA's 303(d) Vision. The focus of the plan would be for the State to identify priority waters/watersheds for which TMDLs, alternatives or protection plans will be completed by 2022.	

WQ-08b	Number and national percent, of approved TMDLs, that are established by States and approved by USEPA [state TMDLs] on a schedule consistent with national policy.	Amy Walkenbach	• Continue watershed based TMDLs according to the request for proposal (RFP). Illinois EPA will start at least four new TMDL watershed projects every six months. • In FFY15 Illinois EPA will begin TMDLS, funded through 319 funds within the PPG, these watersheds are: Bonpass Creek, Horseshoe Lake (Alexander Co.), Galena/Sinsinsawa Rivers, Spring Lake and Little Vermilion (Livingston Co.). Additional watersheds will be added in FFY16. • Deliver a schedule to Region 5 by September 15 of each year, of final TMDLs to be submitted for approval by Region 5 in each subsequent FFY. • Illinois EPA will address 70 segment impairments through completed TMDLs. • Provide draft TMDLs to Region 5, 30 days prior to public notice, or alternative timeframe as agreed upon, for review and comment. • Develop implementation plans for all 319 funded TMDLs.	
		Amy Walkenbach	Illinois EPA will address 135 segment impairments through completed TMDLs, new accountability projects, SP-11 delistings and reassigned Cat 5 impairments to Cat 4b and Cat 4c. Any other delistings resulting in impairments being removed from Category 5 will be taken from the universe of TMDLs needed and the proportional annual reduction equivalent to 1/13 of a TMDL, applied to the annual segment-impairment commitment of 125. It is the intent of Illinois EPA to address 75 segment-pollutant combinations through TMDL development.	

		Amy Walkenbach	Illinois EPA will work with Region 5 to make TMDL process in Illinois more efficient and to ensure that Illinois EPA remains on pace in TMDL development.	
	In recognition that TMDLs developed by Illinois EPA are funded primarily with CWA Section 319 funds, TMDLs will be developed consistent with waters identified (either specifically, or by priority watershed) in Illinois EPA's approved Nonpoint Source Management Program Plan (NPSMP).	Amy Walkenbach	TMDLs will either address the nine elements for watershed based plans as described in EPA's Final NPS Program and Grants Guidelines for States and Territories, App. C (April 2013), or be accompanied by separate implementation plans meeting the nine elements, to provide the basis for implementation project funding with CWA Section 319 funds.	
	Nonpoint Source Management Program Plan. Illinois EPA last updated its NPSMP in 2001.	Amy Walkenbach	Illinois EPA will work with the Region to complete revisions and submit an approvable revised Plan by Dec. 31, 2013. Illinois EPA will implement the Plan upon approval, and will, on an annual basis, review the approved NPSMP and update as necessary.	
	NPS workplan and 319 grant application.	Amy Walkenbach	Illinois EPA will submit, and Region 5 will review and approve annual NPS workplans consistent with the EPA's Final NPS Program and Grants Guidelines for States and Territories, and will take action to award 319 grants in accordance with the following schedule: [Note, this proposed schedule is slightly different than the one laid out in the 2000 agreement between the Agencies, but reflects current practice. August 1 – State competitive subgrant solicitation closes, evaluation begins November 1 – State NPS draft workplan due to EPA including subgrants proposed for funding December 31 – EPA comments on draft workplan to state January 31 – State responds to EPA comments February 28 – State sends full application to EPA April 30, or as funds received from Congress- Grant award	

	Development and implementation of watershed based plans (WBP).	Amy Walkenbach	Annual NPS Program reports required as a condition of 319 grant awards shall, in addition other required items, include lists and schedules of WBPs to be developed and updated in the upcoming FY. Annual Reports shall also identify priority watersheds to be targeted in the request for proposals for NPS implementation projects. (Note: this accomplishment will only be reported in the Annual NPS Program).	
WQ-14a	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements.	Roger Callaway	Illinois EPA will enter all required NPDES data elements, from the annual reports, submitted by POTW with approved pretreatment programs into ICIS. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are properly entered into ICIS.	
	Pretreatment standards and requirements.	Roger Callaway Sreedevi Yedavalli Newton Ellens	Twice a year, by March 31 and September 30, Illinois EPA will provide number and percent of SIUs discharging to POTWs with approved pretreatment programs. Region 5 would like to receive copies of the annual reports from POTWs with approved programs. Illinois EPA will commit to incorporating streamlining language in POTW permits with approved pretreatment programs requiring them to modify their SUOs to incorporate required streamlining requirements. Illinois EPA will commit to incorporating permit language in major POTW permits without approved pretreatment programs to submit data on the industries from which the POTW is receiving process wastewater.	
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	Roger Callaway	Maintain major quarterly compliance rate at >=%95. Annual rate will meet or exceed the national goal.	
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	

		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	
	Joint Enforcement actions against SNC facilities	Roger Callaway	U.S. EPA and Illinois EPA will share joint responsibility in taking enforcement actions against ten (10) SNC facilities. Illinois EPA will prepare the enforcement package for U.S. EPA. U.S. EPA will in turn initiate the enforcement action by issuing the AOs. Illinois EPA will provide technical assistance to USEPA with respect to remedies proposed by the SNC facility. USEPA will issue and track the AOs, track compliance with schedule milestones and terminate order upon completion of compliance requirements.	
Clean Water Action Plan	Resolve State Review Framework items	Bud Bridgewater	By October 31, 2013, Illinois EPA will provide USEPA a draft final Field Procedures Manual for review. The manual will outline the steps for the completion of inspection reports which include appropriate guidelines, procedures, and oversight. The Illinois EPA will follow the national Compliance Monitoring Strategy (CMS) for inspections and will meet the commitments as resources allow.	
	EPA/State permitting and enforcement joint work plan	Sanjay Sofat	U.S. EPA's and Illinois EPA's joint permitting and enforcement work plan elements have been included in the PPA, as put forwarded in U.S. EPA's CWA Action Plan. Illinois EPA and U.S. EPA will implement the work plan to achieve the desired outcome consistent with the timeframes specified. Illinois EPA and U.S. EPA will re-examine the work plan at regular intervals and make changes, if necessary.	

Clean Water Acton Plan	Address Minor "Serious" Violators	Roger Callaway	Review non-compliance reports in response to significant violations. Select appropriate Enforcement Response	
		Roger Callaway Bud Bridgewater	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations.	
		Roger Callaway	At U.S. EPA's request participate in additional discussion with Region 5 to successfully complete EPA's Municipal Infrastructure National Enforcement Initiative focusing on reducing discharges from CSOs and SSOs, keeping raw sewage and contaminated stormwater out of our nation's waters. To address this, U.S. EPA and Illinois EPA will discuss and investigate Sanitary Sewer Systems (SSSs) with total treatment capacity greater than or equal to 10 MGD and Combined Sewer Systems (CSSs) communities serving population greater than equal to 50,000 that continue to have wet weather compliance issues, to determine the appropriate action, if necessary.	
		Roger Callaway	Review and update "Watch Lists" on a quarterly basis	
		Roger Callaway	Single event violation (SEVs) entry will be performed along with the entry of major inspections.	
		Roger Callaway	CSO notifications from municipalities will be entered into ICIS. An approach to tracking SSO notifications will be identified as part of the CSOs strategy that Illinois EPA proposed.	
		Roger Callaway	Illinois EPA will expand the use of electronic reporting to include additional facilities as well as additional types of reports received from wastewater facilities.	
		Bud Bridgewater	Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.	
	Permit Activities	Al Keller	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY14/15.	

WQ-12a		Al Keller	The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Illinois EPA has been working with several local watershed stakeholders to develop watershed-specific nutrient limits based on Illinois' narrative water quality standard. A process to develop watershed-specific nutrient limits is cumbersome. Illinois EPA will need additional time to develop a nutrient permit limit that is supported by local watershed stakeholders. Because of issues raised on nutrient limits based on the Illinois narrative standard, the number of industrial NPDES permits going to public hearings, and ongoing work to resolve and implement solutions to thermal permitting issues, Illinois EPA commits that 80-85% of majors will be current and 85% of minors will be current. Illinois EPA and Region 5 commit to continuing to identify and implement approaches on nutrient limits based on narrative standard; EPA meeting its goal of reviewing selected proposed permits within 30 days. Agreement to implementing an approach to nutrient limits, continuing to resolve thermal permit issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current and 90% of minor permits will be current." Illinois EPA will commit to a higher percentage of minor permits current.	

		Darin LeCrone	Review of NPDES permits for power plants with thermal discharges. 1. Continue to review existing NPDES permit conditions at electric generating facilities for determination of compliance points and include where necessary proper conditions to limit flow and temperature or to measure compliance or model compliance with applicable standards for each permit renewal. 2. Require mixing zone studies where necessary to ensure a measurable compliance point with applicable thermal standards. 3. Renewed permits will specify a heat rejection rate where appropriate, to ensure compliance with any applicable anti-degradation requirements. 4. Identify permits with 316(a) relief that are expiring in the next 2 to 4 years and notify those facilities that they must submit, with their permit renewal application, updated justification that relief meets 40 CFR 125.72 and demonstrates that any alternative limit protects a balanced and indigenous population. 5. For renewed NPDES permits, the permit record will provide the assumptions used to demonstrate that thermal standards will not be exceeded. Review of thermal relief for power plant discharges as NPDES permits are renewed. 1. If the relief is clearly through a 316(a) demonstration, those with pending renewals of permits will get a permit condition to submit updated 316(a) demonstration information during the permit cycle. Permit conditions will be included for studies to be conducted to re-justify existing 316(a) relief that address both the nature of the studies to be conducted or submitted, and the time frame for conducting the studies and submitting results. Submitted results will meet 40 CFR125.72 and demonstrate that any alternative limitation protects a balanced and indigenous population. 2. For permits with no-316(a) relief, Illinois EPA will review the	

			Board opinion/records to evaluate whether the assumptions on which the relief was granted are still accurate and valid. USEPA will provide, as appropriate, its determination regarding the consistency of the relevant Illinois Pollution Control Board orders with the Clean Water Act and federal regulations. The Illinois EPA will evaluate on a case by case basis what additional or alternative permit conditions may be necessary at those facilities from and operational or biological study standpoint.	
WQ-13a		Al Keller	Stormwater – Illinois EPA has reissued the construction site activity general permit. Illinois EPA will reissue the industrial site and MS4 stormwater general permits upon expiration of these permits. Illinois EPA will monitor any new federal regulations concerning these permits (I.e., effluent guidelines for construction site activities, new MS4 requirements, flow rate related restrictions) and modify the permits as necessary.	
WQ-19a	Number of high priority state NPDES permits that are issued in the fiscal year.	Darin LeCrone	Develop new priority permit lists for FFY2014 and 2015 in conjunction with Region 5 as soon as practicable near the end of each federal fiscal year for the upcoming year. Issue 100% of the identified priority permits by the end of each FFY.	
		Darin LeCrone	Permit Backlog List – Illinois EPA will submit a list of major or general permits, expired and expiring, for reissuance by August 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	

		Al Keller Patrick Kuefler	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice. Upon, completion of public notice, Illinois EPA will provide Region 5 for review the proposed permit and Illinois EPA's response to comments.	
		Al Keller	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility which includes an expansion of a facility.	
		Al Keller	Finalize and propose Sludge Regulations adoption during FFY14.	
		Al Keller	Continue to implement the nutrient permitting strategy in permit issuances and reissuances during FFY14, pursuant to Illinois EPA's 11/2/2011 letter to U.S. EPA.	
Clean Water Action Plan - Permitting for Environmental Results	Extend scope of current permits to ensure WET testing requirements	Bob Mosher	Determine protocol for deciding when more monitoring or limits is necessary for chronic WET by March 15, 2012.	

	Confined Animal Feeding Operation (CAFO) Work Plan	Dan Heacock	CAFO Rulemaking - Refer to attached CAFO Work Plan February 4, 2013.	
		Bud Bridgewater	CAFO Inventory and Inventory Updates - Refer to attached CAFO Work Plan February 4, 2013.	
		Bud Bridgewater	CAFO Inventory and Inventory Updates - Refer to attached CAFO Work Plan February 4, 2013.	
		Bud Bridgewater	CAFO Work Load Assessment - Maintain the appropriate level of FTEs to support and manage the CAFO program. Refer to attached CAFO Work Plan February 4, 2013.	
		Dan Heacock	CAFO permit reviews - Refer to attached CAFO Work Plan September 5, 2014. Review and issue CAFO permits in accordance with March 18, 2013 CAFO NPDES Permits SOP.	

		Dan Heacock	Incomplete CAFO Permit applications - Refer to attached CAFO Work Plan September 5, 2014 and take actions in conformance with March 18, 2013 CAFO NPDES Permits SOP.	
			CAFO Permit Application Tracking – Submit CAFO tracker by 27th of every even numbered month.	

		Dan Heacock	Inform CAFOs of amended CAFO rule and permit requirements - Refer to attached CAFO Work Plan February 4, 2013.	
			Revise permit application - Refer to attached CAFO Work Plan February 4, 2013.	
			Propose general permit revisions - Refer to attached CAFO Work Plan February 4, 2013.	

		Roger Callaway Bud Bridgewater	Illinois EPA will enter and maintain medium and large permitted CAFOs in ICIS. USEPA will enter the remaining CAFO inventory once it is received from Illinois EPA into ICIS as a one-time support effort. Regarding the long-term maintenance of the CAFO inventory, Illinois EPA staff will maintain the CAFO inventory of permitted and unpermitted CAFOs through an internal Illinois EPA database. Illinois EPA will provide regular updates (semi-annual) to U.S. EPA of the inventory via its internal database system. Illinois EPA will also look into the possibility of providing updates in the form of changes to the inventory, which may reduce the level of effort required to enter and maintain inventory data. What needs to be resolved is the long-term maintenance of the non-permitted CAFO inventory in ICIS. By the end of FY13 the agencies will assess the workload associated with updating the non-permitted CAFO inventory in ICIS and develop a plan for the long-term maintenance of the CAFO inventory beginning in FY14	
		Bud Bridgewater	CAFO NPDES annual inspection plan, number of evaluations to be conducted, and enforcement actions and escalation - Refer to attached CAFO Work Plan February 4, 2013.	
		Bud Bridgewater	CAFO – Site Specific Inspection Plan - Refer to attached CAFO Work Plan February 4, 2013	
		Bud Bridgewater	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum within six months of their start date, and prior to conducting inspections independently	

		Bud Bridgewater	All staff working on AFO/CAFO issues will be trained on the revised ERG.	
		Roger Callaway	Issue VNs for noncompliance at CAFOs - Refer to attached CAFO Work Plan February 4, 2013	
		Roger Callaway	CCA Case Referrals to AG's Office - Refer to attached CAFO Work Plan February 4, 2013	
		Roger Callaway	CAFOs not responding to VN - Refer to attached CAFO Work Plan February 4, 2013	
		Bud Bridgewater Chuck Gunnarson Roger Callaway	Quarterly Docket Review of CAFO Referrals - Refer to attached CAFO Work Plan February 4, 2013	
	Supplemental Section 106 Funding workplan	Bud Bridgewater	New hires for CAFO Inspections - Refer to attached CAFO Work Plan February 4, 2013	
	Inspections	Bud Bridgewater	Inspection strategy – An inspection plan, by category, will be sent to Region 5 by September 30 and will include projections for each year and consistency with EPA's National Compliance Monitoring Strategy (CMS). Region 5 will comment on the Illinois EPA plan 30 days after submittal.	
		Bud Bridgewater	Frequency of inspecting majors – Majors with good compliance history will be reduced. A specific list and schedule of majors to be inspected will be sent to Region 5 by September 30th of each year.	
		Bud Bridgewater	Reconnaissance inspections – Recon inspections will continue, as resources allow.	
		Bud Bridgewater	Stormwater inspections in conjunction with SWCDs - Agreements are in place with the SWCDs. These agreements govern to operations of this inspection and technical assistance program.	
		Bob Mosher	Illinois EPA will continue to implement the elements of the nutrient plan.	
Joint Priority	Promote the use of anaerobic digesters in Illinois	Marcia Willhite	Anaerobic digesters are used to break down organic wastes and convert them into heat and methane gas, which can then be used to produce electricity. Digesters can be used to manage agricultural wastes to address problems with waste lagoons, impaired water quality, particulate matter, odors, pests and carbon dioxide, while producing renewable energy, and if placed on a brownfield or other contaminated property, can contribute to reuse and redevelopment of such properties. Illinois EPA and EPA	

			agree to work together to promote the increased use of anaerobic digesters through data sharing, outreach to stakeholders, and prioritization of permits and other regulatory approvals for digester projects.	
Joint Priority	Data Synchronization in ICIS	Marcia Willhite	The Integrated Compliance Information System (ICIS) is used directly by the Illinois EPA to evaluate NPDES compliance. It is also used as a source of information for USEPA and the public (via ECHO) on the performance of Illinois EPA's compliance program. Synchronization of data between what Illinois EPA enters and what USEPA draws from the system is crucial, particularly when developing Quarterly Non-Compliance reports (major dischargers) and Annual Non-Compliance Reports (minors). Yet, Illinois EPA continues to spend much time and effort correcting data errors when preparing required reports or fielding calls from dischargers and the public when erroneous data appears in ECHO. Illinois EPA and USEPA will work together to identify the root causes of data discrepancies and propose/implement solutions.	
Environmental Justice	Screen all incoming permit actions/applications for potential Environmental Justice issues.	Ken Page	In accordance with the Environmental Justice (EJ) Public Participation Procedure report all proposed permitting actions for facilities located in potential EJ areas as determined by Illinois EPA's screening tool to the EJ Officer for further outreach.	

DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN

With regard to Illinois' Drinking Water Resource Deployment Plan (PPA), during the week of November 28, 2011, a "team," consisting of representatives of U.S. EPA and The Cadmus Group, Inc., conducted a triennial review at the IEPA and the Illinois Department of Public Health (IDPH). A report of this review was prepared by The Cadmus Group on December 29, 2011. This report identified areas of quality improvement, but generally recognized that every attempt is made by both the Illinois EPA and IDPH to assure public health protection and administration of all of the elements within the Resource Deployment Plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)
Fiscal Year 2014-and 2015
(October 1, 2013 to September 30, 2015)

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

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

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

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

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

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

(1) Promote clear understanding of both State and U.S. EPA commitments.
(2) Minimize ad hoc requests for program reporting.
(3) Promote judicious use of limited resources to achieve the best possible public health protection.
(4) Support efforts to increase resources by clearly identifying resource and program constraints.
(5) Promote collaborative inter-agency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM
CORE STATE ACTIVITIES

⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.

⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.

⇒ Keep adequate records of pertinent State decisions.

⇒ Adopt all rules in a timely manner (within two year extension period).

⇒ Notify all systems of regulatory requirements and respond to questions.

⇒ Determine violations for all rules and report to U.S. EPA.[1]

⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).

⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.

⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.

⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

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

CORE R5 ACTIVITIES

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

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

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

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

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

Acronyms/Abbreviations	
ACS – Annual Commitment System	MRDL – Maximum Residual Disinfectant Level
ARDP – Annual Resource Deployment Plan	NCWS – Non-Community Water System
As – Arsenic	NPDWR – National Primary Drinking Water Regulation
CCR – Consumer Confidence Report	NTNCWS – Non-Transient Non-Community Water System
CFR – Code of Federal Regulations	OCCT – Optimal Corrosion Control Treatment
CPE – Comprehensive Performance Evaluation	pCi/L – picoCurie per liter
CTA – Comprehensive Technical Assistance	PN – Public Notification
CWA – Clean Water Act	ppb – part per billion
CWS – Community Water System	PWS – Public Water System
DBP – Disinfection By-Products	PWSID – Public Water System Identification
D/DBPR – Disinfectants and Disinfection By-Products Rule	PWSS – Public Water System Supervision
DWA – Drinking Water Academy	Rads – Radionuclides
DWSRF – Drinking Water State Revolving Fund	RTC – Returned to Compliance
eDV – Electronic Data Verification (Tool)	SDWA – Safe Drinking Water Act
EnPPA – Environmental Performance Partnership Agreement	SDWIS/FED – Safe Drinking Water Information System/Federal
ERG – Expense Reimbursement Grant	SDWIS/State – Safe Drinking Water Information System/State
ERP – Enforcement Response Policy	SNCs – Significant Non-Compliers
ETT – ERP Enforcement Targeting Tool	SOC – Synthetic Organic Contaminant
FBRR – Filter Backwash Recycling Rule	SOX – "SOX" is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation
GWR – Ground Water Rule	SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager
GWS – Ground Water System	Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule
GUDI – Ground Water under the Direct Influence of Surface Water	SWAP – Source Water Assessment Program
HAA5 – Haloacetic Acids	SWP – Source Water Protection
HSA – Hydrogeologic Sensitivity Assessment	SWTR – Surface Water Treatment Rule
IDSE – Individual Distribution System Evaluation	TCR – Total Coliform Rule
IESWTR – Interim Enhanced Surface Water Treatment Rule	TMDL – Total Maximum Daily Load
IOC – Inorganic Contaminant	TT – Treatment Technique
IUP – Intended Use Plan	TTHM – Total Trihalomethanes
LCR – Lead and Copper Rule	UCMR – Unregulated Contaminant Monitoring Rule
LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule	V&E – Variances and Exemptions
LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule	VOC – Volatile Organic Contaminant
MCL – Maximum Contaminant Level	WBDO – Waterborne Disease Outbreak
M/R – Monitoring/Reporting	WQP – Water Quality Parameter

Annual Resource Deployment Plan Table of Contents

Table 1. Primacy Activities **37**

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Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.1 – Adopt all rules in a timely manner (within two year extension period) Issue: "There are concerns that the emerging technologies associated with LT2SWTR (ultraviolet light disinfection and membrane filtration specifically) are increasingly difficult due to their complexity and lack of staff capable of devoting sufficient time to study the issues. Additional staff in the Permit Section is desirable to devote adequate resources to them."	Illinois EPA has adopted the rules above and is implementing provisions of the rules thru inspections and providing training, technical assistance and taking enforcement actions as necessary.	Region 5 is currently working on the primacy approval for the Radionuclide Rule and the Interim Enhanced Surface Water Treatment Rule.	
1.2 – Notify all surface water and GUDI systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.	
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.	Data is maintained in SDWIS/State.		

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Data is maintained in SDWIS/State and will be used to update SDWIS/FED.	►Region 5 will evaluate extent to which LT2 violations are reported to SDWIS/FED.[1] New Rule Violations as of April 2013 (2010-2012 data) – M/R – LT2 ESWTR – 1 New Rule Violations for April 2014- 1 M/R – LT2SWTR	

[1] **NEW RULE VIOLATION REPORTING QUERY:** The new rule violation reporting query includes all violations for the new rules ever reported for any system type regardless of activity status, which means that there may be violations reported for currently closed systems. The specific rule violation codes included in this query are:

- LCRSTR – 66
- Stage 2 – 30, 35
- LT2 – 32, 33, 37/0800, 41/0800, 42/0800, 45/0800, and 47/0800
- GWR – 31/0700, 34, 41/0700, 42/0700, 45/0700, 48, 73 (36/0700 was an old code programmed into SDWIS/State)

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey. Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the "other activities" section below, respectively).	Illinois has committed to completing 90% of the surface water sanitary surveys under the national measures.	Provide training, as requested. ►Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).[2] As of April 2013 (2010-2012 data) CWS - 86 not completed, 490 completed, 576 total systems. 85.1% NTNCWS – 0 not, 7 completed, 7 total. 100% TNCWS - 0 not, 123 completed, 123 total. 100% As of April 2014 (2011-2013 data) CWS 86.1%, NTNCWS and TNCWS 100% complete. This national measure will be reported again in July 2015 for the period of 2012-2014.	

[2] **SANITARY SURVEY COMPLETENESS QUERY:** The sanitary survey completeness query includes data for all currently active systems. A national measure tracks sanitary survey completeness at surface CWSs as indicated in attachment A (see SDW-1a). The data from the appropriate reporting period will be frozen and considered final at in July of every years.

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at alternate location approved by the State.	Replies have been received from all surface water supplies.		
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Ongoing – will continue.		
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Ongoing – will continue.		
1.9 – Follow-up on turbidity TT violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	
1.10 – Follow-up on individual filter turbidity M/R violations. **a.** Track individual filter turbidity trigger	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
exceedances. **b.** Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.			
1.11 – When required, track the completion of CPE/CTA for PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
1.12 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Ongoing – will continue.		
1.13 – Follow-up on disinfection residual TT violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested	
1.14 – Follow up on disinfection residual M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested	
1.15 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	Ongoing – will continue. Tracked in SDWIS/State.		
1.16 – Ensure that disinfection profiling and benchmarking is conducted when required by rule.	Ongoing – will continue		
1.17 – Ensure that all required records are kept by surface water systems.	Ongoing – will continue.		
1.18 – Complete remaining GUDI determinations.	Ongoing – will continue		

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
2.0 – Total Coliform Rule			
2.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
2.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.	Ongoing – will continue. Tracked in SDWIS/State		
2.3 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State		
2.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State	Region 5 will assist as necessary, or as requested.	

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

able 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
3.0 – Ground Water Rule			
3.1 – Adopt the GWR in a timely manner (within two year extension period).	The IPCB adopted the GWR on 7/27/2007 and the Primacy Application was delivered to Region 5 on 11/3/2009.	GWR primacy was approved on July 29, 2013.	
3.2 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	

able 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
3.0 – Ground Water Rule			
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	*States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.* The Illinois EPA has not yet encountered limitations.	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Data will be tracked in SDWIS/State and transferred to SDWIS 3.0 when available.	►Region 5 will evaluate extent to which GWR violations are reported to SDWIS/FED.[1] New Rules: Violations as of April 2013 (2010-2012 data) – M/R – GWR – 8 Other – GWR – 1 As of April 2014 – M/R – GWR – 11 Other – GWR – 1	

able 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
3.0 – Ground Water Rule			
3.5 – Conduct and report sanitary surveys that meet requirements by **12/31/12** at CWSs and then every 3 years thereafter, and by **12/31/14** at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey. Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the "other activities" section below, respectively). Issue: (same issues regarding staff resource as in LT2SWTR in 1.1)	Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle. Reports will be made as resources allow.	►Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).[2] As of April 2013 (2010-2012) data CWS – 271 not, 883 completed, 1154 total. 76.5% NTNCWS – 8 not, 352 completed, 360 total. 97.8% TNCWS – 42 not, 2833 completed, 2875 total. 98.5% As of April 2014 (2011-2013) data, for GW, CWS – 78.2% completed NTNCWS – 97.5% completed TNCWS – 98.4% completed	

able 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
3.0 – Ground Water Rule			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	Treatment will be required when necessary to ensure a multi-barrier protection strategy at all community water supplies in Illinois		
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	Illinois EPA is implementing a groundwater rule implementation strategy approved by Region 5. Illinois DPH will implement the triggered source water monitoring requirements by the compliance date specified in the GWR		
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	See 3.7 above.		
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ongoing – follow up actions will be taken as appropriate.		
3.10 – Follow-up on corrective action consultation and reporting violations.	Ongoing – follow up actions will be taken as appropriate.		
3.11 – Follow-up on M/R violations.	Ongoing – follow up actions will be taken as appropriate.		
3.12 – Follow-up on public notification violations.	Ongoing – follow up actions will be taken as appropriate.		
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ongoing – follow up actions will be taken as appropriate.		

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
4.0 – Nitrate and Nitrite			
4.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
4.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.	Ongoing – will continue. Tracked in SDWIS/State.		
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State.	In 2012, 88.9% of reporting was on time. In 2013, 100% of reporting was on time.	
4.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
4.5 – Follow-up on M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**

5.0 – Lead and Copper			
5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).	Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented. Illinois DPH has submitted milestone data to the ODS and will continue updating data.		
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented.		
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
5.0 – Lead and Copper			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90th percentile action level sample data for all large and medium sized systems, and 90th percentile action level exceedance sample data for small systems.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will finalize the LCR module of the compliance determination and violation reporting training (CDVRT). ►Region 5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.[1] New Rules: Violations as of April 2013 (2010-2012 data) M/R - LCR – 151 As of April 2014, M/R – LCR – 208	
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
5.7 – Follow-up on all M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	
5.8 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.	Ongoing- will continue.	Region 5 will assist as necessary, or as requested.	
5.9 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.	Ongoing-will continue.		
Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**

6.0 – D/DBPRs			
6.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted LT2 & Stage 2 rules and Illinois EPA & Illinois DPH are in the process of implementing the regulations.		
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	Data will be maintained in SDWIS/ State		
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State	►Region 5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED.[1] New Rules: Violations as of April 2013 (2010-2012 data) – TT –7 Violations as of April 2014 – 7 Stage 1 & 2 DBP MCL violations	
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.6 – Follow-up on all other MCL/MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
5.0 – Lead and Copper			
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.8 – Follow-up on all M/R violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Ongoing – will continue		
6.10 – Follow-up on all other reporting requirement violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
7.0 – IOCs (including Arsenic)			
7.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted IOC Rules and they are being implemented (including arsenic).	Primacy was approved for the Arsenic Rule on July 29, 2013.	
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		

7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.	Ongoing – will continue. Tracked in SDWIS/State.		
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.	As of January 2013, there were 0.5% CWS, 0.2% NTNCWS and 0.0% TNCWS not RTC'd of the active systems for 2012. As of January 2014, there were 0.5% CWS, 0.7% NTNCWS and 0.0% TNCWS not RTC'd of the active systems for 2013.	
7.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
7.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted Radionuclide Rules and they are being implemented.		
8.2 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		

8.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Ongoing – will continue.		
8.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
8.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
8.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested. In the timeframe 2008-2012, there were 20 Rads M/R violations.	

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

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

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
11.0 – Organic and Inorganic Chemical Monitoring Waiver Program			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.	Changes to the approved program not needed during the reporting period. Applicable system's waivers will be evaluated during the appropriate compliance period.		

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

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**

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

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
14.0 – CCR			
14.1 – Notify all regulated water systems of their CCR requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (see http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf).	
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Ongoing – will continue.		
14.3 – Electronically report all CCR violations to SDWIS/FED.	Ongoing – will continue. Tracked in SDWIS/State.		
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
15.0 – Laboratory Certification			
15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the *EPA* Manual for the Certification of Laboratories Analyzing Drinking Water, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official. Issue: "State travel restrictions continue to prevent the training of additional staff to provide back-up for conducting the on-site laboratory assessments"	Illinois does require that all laboratories be certified for SDWA sample result submission and certification occurs every two years. The laboratories are certified to NELAC standards which are equivalent to the EPA Manual. At this time, third parties are not being used to conduct on-site visits. The Illinois EPA will pursue regulatory changes to accept third party certification of radiological samples. Additionally, the Illinois EPA will evaluate long term solutions to Radiological Lab Certification in Illinois.	Region 5 expects to conduct lab audits and program reviews in FY 2015.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
16.0 – Compliance and Enforcement Management			
16.1 – Participate with Region 5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.	Illinois EPA and Illinois DPH commit to participate in PWS program reviews for CWS & NCWS.		
16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.	Ongoing – will continue. Tracked in SDWIS /State	Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.	
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	Ongoing – will continue.	Assist with enforcement referrals, analysis, and data clean up or other joint efforts as requested by state.	
16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	Ongoing – Illinois EPA will continue to provide timely updates to USEPA-Region 5 requests.	Each quarter, Region 5 will send the states updated ERP reports requesting a state update. Region 5 will integrate State updates into reports before the next request is sent out.	

16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2013 and June 2014.	The Illinois EPA has adopted legislation making current Compliance Commitment Agreements enforceable. This measure has been completed.	►Region 5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
17.0 – Data Management			
17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.	For each data submission with errors, the State will contact the Region about their plans for fixing the errors.	Provide technical assistance and program assistance to all Region 5 States related to data management.	
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	Ongoing – will continue.		
17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan): 17.3a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.	Since data management is critical to each State's ability to maintain primacy, when possible, the State will continue to send a representative to the annual ASDWA Data Management Users conference. Note: Item 17.3g has been	Region 5 is continuing to develop compliance determination and violation reporting training (CDVRT). The LCR CDVRT module is nearly complete. In addition, we are trying to obtain funding to complete the remaining modules. **April 2013** frozen data: In 2012,	

17.3b – State will automate the compliance determinations for all rules for which it has primacy. 17.3c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made. 17.3d – State will provide timely compliance determination training to staff, particularly for new rules. 17.3e – The State will work with the Region to test/evaluate the eDV tool. 17.3f – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State's plans or schedule to use them including the eDV tool. 17.3g – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.	Completed and data will continue to be updated.	Illinois showed 98.4% of its TCR reporting on-time. Excellent improvement. **April 2013** data freeze: 88.9% of 2012 nitrate reporting was on-time and 100% within one quarter. April 2014 – In 2013, 96.0% of TCR and 100% of nitrate reporting was on time. Region 5 requests that IL copy Region 5 when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.	

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
18.0 – Annual Compliance Report			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.	Illinois EPA will provide future reports by July 1st of each calendar year	OECA to provide annual ACR guidance. R5 will forward guidance when received.	
19.0 – Variances and Exemptions			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	This is not applicable to Illinois.		

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA's Strategic Plan and State/U.S. EPA Shared Goals			
20.1 – Gather information to track strategic plan progress. State directors will attend the annual Region 5 state directors meeting in **April 2014** and **April 2015** to discuss primacy and implementation issues.	Illinois EPA will report these measures through the PPA.	Compile information and report to HQ. Annually assess each State's progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public	Goal: EOY: Milestone 1 ≥95.0% 96.8% Milestone 2 ≥95.0% 100% Milestone 3 <5.0% 2.8% Milestone 4 <10.0% 9.5% Milestone 5 <5.0% 0.5% Milestone 6 <10.0% 24.4% Milestone 7 <10.0% 0.1% See shared goals descriptions at end of document.

Table 1. Primacy Activities			
Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA's Strategic Plan and State/U.S. EPA Shared Goals			
		understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources. Region 5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
1.0 – Preparing for Security Threats at PWSs			
1.1 – State-specific security work plan activities.	The Illinois EPA will verbally report security activities as needed by U.S. EPA Region 5.	Review work plan updates. Hold quarterly conference calls with state security contacts.	
1.2 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.	Illinois EPA has planning documents in association with the Illinois Emergency Management Agency. Based upon resource limitation, sector specific plans may be evaluated in the future to augment existing plans.		

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
2.0 – Operator Certification			
2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.	The Illinois EPA will continue to provide these reports annually.	Coordinate information and issues on Op Cert Program implementation and annual reports.	
2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators and (2) provide training and opportunities for upgrading and renewing certification for existing operators.	Ongoing – will continue.		
2.3 – Provide supplemental certification and training to water system operators on relevant topics from section 7.0 "Sustainable Infrastructure" of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.	The Illinois EPA will coordinate with USEPA-Region 5 on this activity.	Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
3.0 – Capacity Development			
3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.	Illinois EPA will provide future reports by December 31 of each calendar year.	Region 5 will send a reminder to the State about the capacity development annual report in August 2014 and August 2015.	
3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.	IEPA will provide future reports to the governor as appropriate. Reports will be submitted by October annually.	Region 5 will send a reminder to the State about the report to the governor in August 2013.	
3.3 – Promote "Sustainable Infrastructure" activities as described in section 7.0 of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	Illinois EPA staff continues to seek efficiencies to encourage Capacity Development at community water supplies.		

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
4.0 – Source Water Assessments and Protection			
4.1 – Update source water assessments, including effects of climate change, as resources allow.	Ongoing – will continue.		
4.2 – Assist local community source water protection (SWP) plan preparation and implementation, including climate change adaptation activities, in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	SWP plan development and implementation will be achieved with assistance from the following SWC partners: Illinois EPA will continue to work with the IRWA and local stakeholder to encourage regulatory and non-regulatory protection programs.	Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination. Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance. The Annual SWP meeting was in April 2014. It was delayed due to the government shutdown in October 2013. The next meeting will be in the spring of 2015 at a location TBD. Encourage interstate communication through conference calls and an annual State–Region 5 EPA meeting.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
4.0 – Source Water Assessments and Protection			
4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible). For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012**.**	Illinois EPA- Groundwater Section staff is updating source water assessments and will evaluate the most efficient mechanism to report program measures to the USEPA-Region 5. The Illinois EPA loads data into SDWIS such that it can be used to report implementation progress.	Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ. For 2012: % of CWS with minimized risk b/c of SWP 46.5%. Target not met, 50%. % of population served by CWSs with minimized risk b/c of SWP 69.9%, which exceeds the target of 42%. For 2013: 47% of CWS with minimized risk b/c of SWP. Target of 47% met. 70% of population served by CWS with minimized risk b/c of SWP. Target of 71% almost met.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
4.0 – Source Water Assessments and Protection			
4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.	Illinois EPA continues to actively coordinate program activities between Clean and Safe Drinking Water Act program, both within the Bureau of Water. Such activities include coordination on Clean Water Act Section 319, Mine Program, NPDES and sludge application programs. Additionally, the Interagency Coordinating Committee and Groundwater Advisory Council continue to meet on a quarterly basis which brings together planning impetus with Agricultural and Resource based Agencies as well as Regulatory Program areas.	Provide training, technical assistance, and technology transfer capabilities. Facilitate the adoption and sharing of Geographic Information System databases to support local decision making. Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP. Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
4.0 – Source Water Assessments and Protection			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	Ongoing – will continue.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	
Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
5.0 – DWSRF			
5.1 – Implement all required activities.	Ongoing – will continue.	Review IUP and set-aside workplans. Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.	
Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report			
6.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State's PWSS program to support the various components of the PWSS program implementation logic model.	Illinois EPA will continue to coordinate with USEPA Region 5.	Use the logic model to improve our ability to understand measure, assess, and communicate progress. SPM will work with state program to determine state-specific approach, and schedule.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
7.0 – Sustainable Infrastructure			
7.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.	Illinois is evaluating continuing the small systems compliance grant program. This program is designed to provide financial capacity by awarding grants to very small community water supplies. This grant program was initially funded through DWSRF loan repayments. Funding sources are being evaluated at this time for continuation of the program.	Participates in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense. Participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives. ►Region 5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.	

Table 2. Other Activities			
Other Activity Components	**State Commitment**	**Region 5 Activities**	**State/U.S. EPA Evaluation**
8.0 – Environmental Justice			
8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.	Ongoing – will continue.	Region 5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns through EJSCREEN, which will be introduced to the states by late summer 2014. States currently have access to the public tool, EJView, available online at: http://epamap14.epa.gov/ejmap/entry.html.	

Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA's Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

Table A. Final FY 2014 National Water Program Guidance:
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures

NOTE: The information in the table below is based on final FY2014 measures at http://www.epa.gov/planandbudget/annualplan/FY14_OW_NPM_Gdnce.pdf, http://www.epa.gov/planandbudget/annualplan/FY14_OECA_NPM_Gdnce.pdf, and http://www.epa.gov/ace/contaminants/#drinking.

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-211	By FY2014, **90** percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. State FY14 and 15 target:
SDW-SP1.N11	By FY2014, **90** percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. State FY14 and 15 target:
SDW-SP2	By FY2014, CWSs will provide drinking water that meets all applicable health-based drinking water standards during **95** percent of "person months" (i.e., all persons served by CWSs times 12 months). State FY14 and 15 target:
SDW-SP4a	By FY2014, minimize risk to public health through source water protection for **50** percent of CWSs (i.e., "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-SP4b	By FY2014, minimize risk to public health through source water protection for **42** percent of the population served by CWSs (i.e., "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-01a	By FY2014, **90** percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules and the Ground Water Rule. State FY14 and 15 target:

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-03	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. **This is an indicator that HQ reports.**
SDW-04	In FY2014, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). **HQ reports.**
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). **HQ reports.**
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. **This is an indicator that HQ reports.**
SDW-12	Percent of DWSRF dollars awarded to small PWSs serving <500, 501-3,300, 3,301-10,000 consumers. **This is an indicator that HQ reports.**
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. **This is an indicator that HQ reports.**
SDW-14	Number and percent of CWSs and NTNCWSs, including new PWSs, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). **This is an indicator that HQ reports.**
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. **This is an indicator that HQ reports.**
SDW-16	Average time for small PWSs (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). **This is an indicator that HQ reports.**
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. **This is an indicator that HQ reports.**
OECA ACS code	**Goal 5: Compliance and Environmental Stewardship Subobjective 5.1.2: Address Environmental Problems from Water Pollution**
5.1.2 (SDWA02)	During FY2014, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2013 ETT report[3].

[3] A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2014 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.

SHARED GOALS:

By 2016:

1. % of NTNCWS meeting all health based standards CY 2006-12
2. % of TNCWS meeting all health-based standards CY 2006-12

Measure	America's Children and the Environment, Third Edition (ACE3) Drinking Water Contaminants
E6	Percentage of children served by CWSs that did not meet all applicable health-based drinking water standards. **This is an indicator that HQ reports.**
E7	Percentage of children living in areas served by CWSs with violations of drinking water monitoring and reporting requirements. **This is an indicator that HQ reports.**

3. % of TNCWS with significant/major monitoring vi% of population served by CWS with significant/major monitoring violations CY2006-12
4. % of CWS with significant/major monitoring violations CY 2006-12
5. % of NTNCWS with significant/major violations for acute health risks (NO3, microbial and SWT) CY 2006-12
6. % of NTNCWS with significant/major monitoring violations for chronic health risks CY 2006-12
7. olations CY 2006-12

Attachment B: Unregulated Contaminant Monitoring Rule

(UCMR) Partnership Agreement

Illinois Environmental Protection Agency

U.S. Environmental Protection Agency Region 5

PARTNERSHIP AGREEMENT for the IMPLEMENTATION of the

UNREGULATED CONTAMINANT MONITORING REGULATION (Cycle 3)

BACKGROUND

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

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

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

PURPOSE

This PA is intended to support the implementation of the UCMR by identifying the key implementation activities which will be performed by the State for the third UCMR monitoring cycle (UCMR3). While States are not responsible for implementing the UCMR, the Association of State Drinking Water Administrators (ASDWA) and the EPA encourage States to assist the EPA to the extent feasible as the activities in this PA are implemented. The principal agent within the EPA's OGWDW charged with implementation responsibility for the UCMR is the Technical Support Center (TSC), located in Cincinnati, Ohio. A key role of the EPA Regional Office is to establish an agreement with States; identifying what each

State will do to implement specific provisions of the regulation. The extent to which the State engages in implementing the UCMR jointly with the EPA will depend on many considerations. If a State wishes to participate in UCMR implementation, the State must agree to carry out the review of the initial State Monitoring Plan, as provided in Section 1445(a)(2)(C)(I) of SDWA. This role is provided in Part 1, Necessary Responsibilities, of the attached agreement. The State may elect to assume additional responsibilities over and above those identified in Part 1 in assisting the EPA's direct implementation responsibility for the UCMR. These other responsibilities are identified in Part 2, Supplemental Responsibilities. These are to be determined through discussions between Regions and each State.

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

RATIONALE

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

LIMITATIONS

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

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

MODIFICATION NOTIFICATION

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

UCMR IMPLEMENTATION: ROLES AND RESPONSIBILITIES

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

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

Part 1- Necessary Responsibilities

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

Part 2 - Supplemental Responsibilities

2. X Provide (or ensure) the proper PWS inventory data (PWSID, facility ID and sample point ID) for each PWS to use for reporting their monitoring data in the Safe Drinking Water Accession and Review System (SDWARS). This may include initially providing the complete inventory and correcting or adding facilities and/or sample points, when necessary.

3. Review representative sampling plans for reduced monitoring submitted by PWSs with groundwater sources that have multiple entry points to the distribution system. Inform the EPA of the State's approval, modification, or disapproval. **If the EPA does not receive your recommendation within 60 days of your receiving the PWS's proposed representative groundwater wells monitoring plan, then the EPA will assume State concurrence.**

4. Notify large PWSs of their Assessment Monitoring and/or Screening Survey responsibilities within 30 days

   of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify large systems.**

5. Notify small PWSs that are part of the final SMP of their Assessment Monitoring or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. If **the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify small systems.**

6. Notify the EPA/TSC at least 6 months before monitoring is to occur that the State will perform the sampling for the small PWSs in the SMP for Assessment Monitoring and/or Screening Surveys. **If the EPA does not hear from you by this deadline, then the EPA will assume the PWSs will perform the sampling.**

7. Specify an alternate monitoring date, if the State is going to collect samples for small PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**

8. If the State is going to collect large PWSs samples, assign the monitoring schedule for the large PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**

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

Illinois Program Work Plan for Calendar Years 2014-2016

Agreement Between
Illinois Environmental Protection Agency and Region 5, U.S. Environmental Protection Agency

Pursuant to federal assistance statutes, the Illinois Environmental Protection Agency (Illinois EPA) and Region 5, U.S. Environmental Protection Agency (EPA Region 5) work together to implement authorized, delegated, and/or approved environmental programs within the State of Illinois in a timely, appropriate, and effective manner. Together we establish priorities, negotiate program commitments and work sharing, and evaluate program performance.

Illinois EPA and EPA Region 5 are replacing the previous Work Plan Agreement as a means to continue our partnership to strengthen Illinois' NPDES permitting for CAFOs and to significantly reduce the Clean Air Act Permit Program permit backlog. The Work Plan for 2014-2016 includes activities and commitments for both Agencies relating to the Clean Water Act National Pollutant Discharge Elimination System (NPDES) and Clean Air Act Title V permitting program.

Illinois EPA and EPA Region 5 will monitor progress under the Work Plan Agreement via existing program-to-program communications, as well as during the annual joint senior management planning meeting. The Work Plan may be adjusted by mutual agreement.

The execution of this Agreement demonstrates our continuing commitment to environmental improvement through a strong partnership and shared responsibility for meeting our regulatory obligations.

Entered into on 9/5/2014

For Illinois EPA:

Lisa Bonnett, Director
Illinois Environmental Protection Agency

For EPA Region 5:

Susan Hedman
Regional Administrator

Illinois Program Work Plan

For Calendar Years 2014 -2016 Water Programs

In March 2008, the Illinois Citizens for Clean Air & Water (Illinois Citizens) submitted a petition to the U.S. Environmental Protection Agency (U.S. EPA) requesting the withdrawal of Illinois' authorized Clean Water Act National Pollutant Discharge Elimination System (NPDES) program. Illinois Citizens contend that the Illinois Environmental Protection Agency (Illinois EPA) was not properly administering the NPDES program for concentrated animal feeding operations (CAFOs). In February 2009, Illinois Citizens, joined by the Environmental Integrity Project, provided additional information in a supplementary petition to U.S. EPA.

U.S. EPA conducted an informal investigation of the petitioners' allegations and issued a report in September 2010[1]. The report discusses U.S. EPA's initial findings for the various program areas, and the actions that Illinois EPA must take to comply with Clean Water Act requirements for authorized state NPDES programs. In particular, Illinois EPA must accomplish the following:

NPDES Permitting for CAFOs

- Issue NPDES permits to CAFOs that are required to be permitted under NPDES regulations.
- Develop and maintain a comprehensive inventory of CAFOs and evaluate their regulatory status.
- Establish technical standards for nutrient management by Large CAFOs and revise title 35 of the Illinois Administrative Code, Subtitle E, as necessary to be consistent with the federal CAFO rules.
- Ensure that sufficient resources are maintained to issue or deny permits.

NPDES Compliance Monitoring and Enforcement for CAFOs

- Revise the inspection process for livestock and poultry facilities to enable Illinois EPA to determine and track whether inspected facilities are CAFOs that are required to have NPDES permits and whether they are in compliance with NPDES requirements.
- Develop standard operating procedures and properly investigate, track, and respond to citizen complaints reporting potential violations of NPDES requirements.
- Take timely and appropriate enforcement action to address noncompliance by CAFOs.

[1]See the "Initial Results of an Informal Investigation of the National Pollutant Discharge Elimination System Program for Concentrated Animal Feeding Operations in the State of Illinois" (Initial Results), available at: http://www.epa.gov/region5/illinoisworkplan/.

- Require that Illinois EPA enforcement actions address CAFOs failing to apply for an NPDES permit, where a facility has discharged, is discharging, or is designed, constructed, operated, or maintained such that it will discharge.
- Ensure that sufficient resources are maintained for inspections and enforcement of NPDES requirements for CAFOs.

Progress to date and plan forward

- Since February 2011, Illinois EPA has hired and trained new CAFO staff; made progress on issuing, reinvestigating and tracking CAFO permits; has developed an inventory of large CAFOs; has made progress on conducting and tracking CAFO inspections; has issued violation notices and referred actions to the Illinois Attorney General's Office; has submitted proposed amendments to Title 35 of the Illinois Administrative Code to the Illinois Pollution Control Board; has developed and implemented standard operating procedures; and has developed and implemented its Enforcement Response Guidelines related to inspections and enforcement.
- Both Illinois EPA and U.S. EPA agree to extend the Work Plan Agreement through calendar year 2016 to continue the progress to meet the Objectives established in the 2011 and 2013 Work Plan Agreements.

The following are specific actions that Illinois EPA and U.S. EPA will continue to take to address the initial findings in U.S. EPA's report:

1. To ensure consistency with the Clean Water Act requirements, Illinois EPA will devote sufficient staff to implementation of the CAFO NPDES permitting and enforcement programs. At all times, Illinois EPA will ensure that sufficient resources are maintained to issue or deny permits expeditiously.

2. Within 60 days of receipt of U.S. EPA's review of Illinois EPA's final workload assessment, Illinois EPA will submit a revised final workload assessment.
3. Illinois EPA will continue to provide U.S. EPA with a bi-monthly status report on each CAFO permit application. Any future changes to the current version of the status report shall be mutually agreed upon by Illinois EPA and U.S. EPA.
4. Within 90 days following publication of amendments to 35 III. Adm. Code, subtitle E, Illinois EPA and U.S. EPA will jointly identify permit conditions that Illinois EPA could modify and practices that Illinois EPA could adopt, consistent with the 2003 and 2008 federal rules for CAFOs, to streamline the process for review of Nutrient Management Plans (NMPs) and incorporation of NMP terms into permits. For any conditions or practices so identified, Illinois EPA will act to modify the conditions or adopt the practices in accordance with a mutually agreed upon schedule.
5. Within 90 days following publication of amendments to 35 Ill. Adm. Code, subtitle E, Illinois EPA will submit to U.S. EPA for approval or approval with modification revisions to the March 2013 Standard Operating Procedure (SOP) for CAFO NPDES Permits so the SOP is consistent with the published amendments.
6. For permit applications submitted prior to March 31, 2011, Illinois EPA will either issue or deny permits to applicants or refer the matter to the Illinois Attorney General's office for formal enforcement or to U.S. EPA for an information collection order by December 31, 2014. For all other permit applicants, Illinois EPA will take action in accordance with its approved SOP for CAFO NPDES Permits.
7. Within 90 days after publication of amendments to 35 Ill. Adm. Code, subtitle E, Illinois EPA will inform the owner of each Large CAFO in the State's inventory, in writing, about the unpermitted discharge prohibition and the duty to apply for a permit, and the potential consequences for discharge without a permit. Illinois EPA will provide a draft of the letter to U.S. EPA for review and approval or approval with modification.
8. Within 60 days after the amendatory rulemaking becomes effective, Illinois EPA will submit the final amendments to U.S. EPA for action under 40 C.F.R. §123.62.
9. Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will revise its permit application forms and formally ask the public to comment on draft modifications to general permitILA01, as appropriate, based on the amendments and the federal regulations.
10. Illinois EPA will update and submit to U.S. EPA its Large CAFO inventory by August 31 and February 28 each year. By these same dates, Illinois EPA will ensure that the updated inventory is available to all Illinois EPA staff and the public in an easily accessible format. The inventory will include all confirmed Large and permitted CAFO sites identified by Illinois EPA based on information in permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, and the Illinois Department of Public Health.
11. By October 31, 2014, Illinois EPA will submit a plan to maintain the inventory. The plan will specify how Illinois EPA will maintain the inventory including a process of confirming sizes and whether discharges are occurring at unpermitted large and medium livestock facilities and documenting the determinations. The plan will also include the process to get updates from the Illinois Department of Agriculture and Illinois Department of Public Health. Within 60 days of receipt of U.S. EPA's review of Illinois EPA's plan, Illinois EPA will submit a final plan.

12. Each year between October 1 and September 30, U.S. EPA will conduct 2 oversight inspections of Illinois EPA NPDES CAFO inspections to evaluate the effectiveness of the Illinois EPA inspection program. U.S. EPA inspectors will document their findings, and evaluate the thoroughness and scope of prior Illinois EPA inspections as well as the appropriateness of the record-keeping and reporting associated with the inspections. U.S. EPA will provide copies of these inspection reports to Illinois EPA within 60 days of completion.

Attachment D: Environmental Justice

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1: Protect Human Health				
Work Plan Outcomes/Measures – Environmental Justice				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
Environ-mental Justice (EJ)	Environmental Justice Advisory Group	Ken Page	Co-chair quarterly meetings and report issues to the Director and resolve issues that are presented during the meeting.	
Environ-mental Justice (EJ)	Commission on Environmental Justice	Ken Page	The Illinois EPA will provide administrative and other support to the Commission. The Agency's EJ Officer will represent the Director on the Commission.	
Environ-mental Justice (EJ)	Develop a new screening tool to screen all permits and permitted actions for potential Environmental Justice areas.	Ken Page/Ted Prescott	Screening tool will be used by all bureaus to screen all permits and permitted actions for location within a potential EJ area.	
Environ-mental Justice (EJ)	Continue to develop the Permit WebPortal	Info. Technology	The permit webportal will eventually give the public an opportunity to search all permits or permitted actions that are in potential EJ areas.	
Environ-mental Justice (EJ)	Monthly USEPA Region 5 conference calls.	Ken Page	Participate in conference calls and provide input and comments on the Agency's EJ program and any updates and actions.	
Environ-mental Justice (EJ)	Monthly USEPA All States Environmental Justice calls	Ken Page	Participate in conference calls and provide input and comments on the Agency's EJ program and any updates and actions. Make presentations when requested and necessary.	
Strategic Goal 5: Enforcing Environmental Laws				

Strategic Objective 5.1: Enforce Environmental Laws				
Work Plan Outcomes/Measures – Environmental Justice				
Grant Code	**Template Measures**	**Contacts**	**Performance Partnership Agreement Planned Accomplishments**	**Performance Partnership Grant Status/Progress**
Environ-mental Justice (EJ)	Work with Environmental Justice communities on multi-media inspections and single-media inspections when requested	Ken Page/Chris Pressnall	Conduct multi-media inspections as warranted to address Environmental Justice (EJ) concerns raised by EJ groups and/or USEPA. As appropriate, initiate enforcement actions.	
Environ-mental Justice (EJ)	Develop Environmental Justice Public Participation Procedure	Ken Page	Illinois EPA will finalize and implement. Report to USEPA's Office of Civil Rights	
Environ-mental Justice (EJ)	Revise Environmental Justice Public Participation Policy	Chris Pressnall	Revise EJ Public Participation Policy in accordance with the revised EJ Public Participation Procedure.	