

# **Water Pollution Control Loan Program**

**2022 Intended Use Plan**

**DRAFT - May 27, 2021**

**FINAL - JULY 1, 2021**



**Illinois EPA**

**Bureau of Water**

**Infrastructure Financial Assistance Section**

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## **I. Introduction**

The Illinois Environmental Protection Agency (Illinois EPA) was created on July 1, 1970 by combining the State Sanitation Board and parts of the Illinois Department of Public Health. Illinois EPA's central office is in Springfield, and eight regional offices and one laboratory manage the Agency's various programs. The Director of Illinois EPA is appointed by the Governor and serves as a Cabinet Member. The 2022 Water Pollution Control Loan Program (WPCLP) Intended Use Plan (2022 IUP) describes how the Illinois EPA proposes to prioritize projects, distribute funds, and administer the WPCLP during State Fiscal Year (FY) 2022, July 1, 2021 through June 30, 2022.

### **A. Public Participation**

The Draft 2022 IUP was released for public review on May 27, 2021, thus beginning the 30-day public comment period. The Draft 2022 IUP notice was placed on Illinois EPA's general notice website <https://www2.illinois.gov/epa/public-notices/Pages/general-notices.aspx> and each of the identified stakeholders of the Clean Water State Revolving Fund (SRF) program were also notified by e-mail. The notice directed potential commenters to Barb Lieberoff, Office of Community Relations as the Agency contact for receiving comments and questions pertaining to the Draft 2022 IUP.

### **B. Benefits of the WPCLP**

The WPCLP is designed to operate in perpetuity to provide low interest rate loans and other forms of assistance for water resource protection and improvement projects. Using the WPCLP to fund water resource protection and improvement projects has many advantages, including:

- 1) Below-market rates provide significant cost savings.
- 2) Although the WPCLP must follow certain Federal and State requirements, overall it is a State program. As the program is administered by State personnel, application and funding requirements have been streamlined to ensure clarity and efficiency for the applicant.
- 3) The WPCLP, through its various project review and approval procedures, is more than just a funding program. It helps provide applicants greater assurance that their projects will be economically sound, technically appropriate, and environmentally effective.
- 4) The WPCLP can benefit small and economically disadvantaged communities throughout Illinois by not only providing a thorough review of the technical and financial viability of their projects, but also offering principal forgiveness and reduced interest rates where applicable.

## **II. Goals for the WPCLP**

### **A. Short-Term Goals**

- 1) Continue to implement the recently revised project prioritization scoring process for use in the implementation and development of the FY2022 Project Priority List and IUP. Illinois EPA promulgated a revision to 35 Ill. Adm. Code Part 365 (Loan Rules), incorporating the new

prioritization system. The administrative rule containing the old prioritization system, 35 Ill. Adm. Code Part 366, "Procedures and Requirements for Determining Loan Priorities for Municipal Wastewater Treatment Works", was repealed.

- 2) Provide funding to as many eligible projects as possible, to the extent that the requirements for obtaining funding are satisfied and funds are available.
- 3) Focus financial assistance for projects necessary to achieve or maintain compliance with federal and state laws and regulations.
- 4) Continue to provide support for projects, or project components, focused on "green infrastructure, water or energy efficiency improvements or other environmentally innovative activities".
- 5) Manage a program that provides applicants with a streamlined approach to financing wastewater treatment works and other eligible projects.
- 6) Provide continuous improvement to both the short and long-term planning efforts to ensure the financial strength and stability of the loan programs are maintained.
- 7) To meet the demand for assistance during FY2022 and beyond, the Illinois EPA intends to borrow against the WPCLP's loan repayments by issuing revenue bonds. The Illinois EPA continues to work with the Illinois Finance Authority and financial advisors to analyze the leveraging capacity of the SRF loan programs, the immediate need for bond proceeds and the future average annual funding levels the WPCLP can provide while maintaining its perpetuity requirements.
- 8) Analyze the methodology used for the establishment of loan program interest rates and initiate a rule modification to establish a new basis for determining interest rates to strengthen the long-term viability of the loan program and ensure a stable and perpetual financing source.

## **B. Long-Term Goals**

- 1) Assist a broad range of water quality improvement actions that help fulfill the objective of the Clean Water Act.
- 2) Facilitate the development and implementation of technically appropriate and financially sustainable projects by small communities.
- 3) Continue to proactively develop assistance opportunities to encourage implementation of priority water quality improvement projects and Agency priorities.
- 4) Manage the Water Revolving Fund (the Fund) to ensure appropriate levels of financing and adequate funds to administer the program are available.
- 5) Continue to assist in the development and implementation of innovative and non-traditional projects that benefit water quality resources.
- 6) Encourage the consolidation and/or regionalization of wastewater collection and treatment systems so these systems may take advantage of economies of scale and the most cost-effective solutions to wastewater collection and treatment.

- 7) To maintain the integrity of the Fund by providing a stable and perpetual financing source for publicly operated treatment works, collection systems and other eligible projects in the State, and to commit all available loan resources to those eligible loan applicants.

<b>III. Sources and Uses of the WPCLP for FY 2022</b>
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**A. Sources and Amounts of FY 2022 Funds**

- 1) Illinois EPA will make up to \$600,000,000 available for WPCLP funding in FY2022, as detailed in the table below. To meet the demand for assistance during FY2022 and beyond, the Illinois EPA intends to borrow against the WPCLP’s loan repayments by issuing revenue bonds in the future as cash is needed. Based on financial analysis provided by the Illinois Finance Authority, combined with information gathered from the Agency’s own cash flow modeling tools, the Illinois EPA has determined that it needs to return to establishing an annual funding ceiling to maintain the financial health of the Fund. This decision is driven by the amount of revenue bonds needed to fund the program at current levels as well as the need to limit funding commitments in the future to meet the obligations, both in funding commitments and debt obligations, of the program from prior years.

In FY2022 the WPCLP will impose a funding cap<sup>1</sup>, whereby no more than 25% of the available funds (\$150,000,000) will be reserved for any one loan applicant. Should excess funds remain available at the end of FY2022, an applicant may be provided additional funds even if it results in the funding cap being exceeded, provided no other applicants have met the requirements to obtain funding. This step is being taken to maintain the fiscal health of the Fund, while also ensuring distribution of the available funds across the state of Illinois to as many communities as possible.

*The capacity of the WPCLP will be established in the future based upon the financial analysis and cash flow modeling done by the Illinois Finance Authority and its financial advisors in conjunction with consultation with Illinois EPA in order for the WPCLP to remain operational in perpetuity as required by USEPA.* Annual funding levels will be reviewed and established each year while developing the IUP to continue to maintain the WPCLP in perpetuity.

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<sup>1</sup> In accordance with the Loan Rules; *Section 365.260 - The Agency may establish the annual limitations on the amount of loan assistance given to each loan recipient by considering the status of the Fund, capitalization grant amounts, economic conditions and requirements established by USEPA. The annual limitations on the amount of loan assistance established by the Agency must be included as part of the Agency’s Intended Use Plan.*

<b>Availability of Funds</b>	<b>Amount</b>
Federal FY2021 Federal Capitalization Grant Funds	\$71,861,000
State Matching Funds*	\$0
Projected Carryover Funds from FY2021	\$300,000,000
Additional Bond Proceeds**	\$106,637,536
Loan Repayments, Reimbursements, Accrued Interest***	\$121,501,464
<b>Total Available Funds</b>	<b>\$600,000,000</b>

\* State Matching Funds were provided in State FY21 from the anti-pollution bond fund.

\*\* Funds will be acquired as necessary to meet demand.

\*\*\* Balance available to WPCLP after meeting all debt service obligations.

Historical and projected WPCLP annual funding levels:

2018	\$395.6M
2019	\$443.0M
2020	\$255.5M
2021	\$407.9M
2022	\$600.0M
2023	\$450.0M
2024	\$425.0M

## 2) Cash Draw Ratios and Obligation of Federal and State Funds

The WPCLP will maintain the required ratios of cash draws and obligations between Federal funds and State funds to reduce accumulated unliquidated obligations. The priority of disbursements is State Match, Capitalization Grant funds, leveraged bond funds followed by repayments.

The Illinois EPA received appropriation authority from the anti-pollution bond fund in fiscal year 2021 which provided funds necessary to match the 2021 Capitalization Grants. These state match proceeds will be 100% disbursed prior to the Agency drawing any federal funds from the 2021 grant award. The Agency will then draw the 2021 Capitalization Grant Federal funds at a 100% ratio until all grant funds are exhausted.

Binding Commitments: In managing the WPCLP funds, the State must enter into loan agreements that provide financial assistance in an amount equal to 120% of the amount of each Capitalization Grant payment received, within one year after receiving its grant payment. Illinois EPA will provide loan commitments within one year that exceed 120% of the Capitalization Grant.

3) Leveraging

To meet the demand for assistance during FY2022 and beyond, the Illinois EPA intends to borrow against the WPCLP's loan repayments by issuing revenue bonds. The Illinois EPA has been working with the Illinois Finance Authority and financial advisors to calculate the leveraging capacity of the SRF loan programs, the immediate need for bond proceeds and future average annual funding levels the WPCLP can provide and still maintain the USEPA's perpetuity requirements. The Agency issued a par amount of \$450,000,000 in leveraged bonds in State FY2021; net proceeds for the program incorporating premium, cost issuance and underwriters discount was \$574,505,999.

4) Transfer of Funds

Illinois EPA took advantage of the Water Infrastructure Fund Transfer Act which temporarily expands the Clean Water to Drinking SRF transfer authority specifically to address lead-related threats to public health. This transfer resulted in \$107,892,848 being transferred to the Public Water Supply Loan Program (PWSLP) to provide funding in the form of principal forgiveness for complete lead service line replacement activity.

Illinois EPA is reserving the right to transfer an amount up to 33% of the cumulative Drinking Water State Revolving Fund (DWSRF) Capitalization Grants from the WPCLP to the PWSLP, or an equivalent amount from the PWSLP to the WPCLP. In State FY 2019, the WPCLP transferred \$39,000,000 of Fund equity to the PWSLP to assist with the PWSLP's current cash flow needs and to allow the PWSLP to leverage less bond funds in order to assist in sustaining the future capacity of the PWSLP.

5) Proportionality

Illinois EPA will spend 100% of all state match funds prior to drawing federal funds and can then draw federal funds at a rate of 100% until the matched grant is exhausted.

6) Financial Planning

The financial planning process is aimed at maximizing 100% of program resources available as efficiently and responsibly as possible while minimizing long-term financial risk in the program. Illinois EPA has engaged financial advisors to independently determine the optimum amount of loan disbursements that is sustainable over the next 20 years while maintaining the USEPA's perpetuity requirements. Illinois EPA is enhancing its current methods of determining the timing of cash inflows and the effect on available resources to meet current and future obligations. Illinois EPA monitors on an ongoing basis cash balances available for disbursement to loan borrowers and needs of the program. Leveraged bond sales will occur as the cash needs of the program dictate.

7) Grant Payment Schedule

In each wastewater Capitalization Grant Application (Form 424), and in the cover letter to U.S. EPA, Illinois EPA requests the Capitalization Grant be immediately placed in the "Automated Standard Application for Payment" system for drawing for projects.

## B. Project Priority List

The IEPA has developed a Project Priority List (PPL) (Appendix D) that identifies applicants eligible for assistance and is comprised of all projects which submitted a Funding Nomination Form prior to March 31, 2021. There are \$1,759,720,837 worth of projects on the FY2022 WPCLP PPL List, far exceeding the amount of funding available.

Projects on the PPL are in various stages of the funding application process but only those projects identified on the **Intended Funding List** have funds reserved for them during the first six months of FY2022. *Projects which are not on the Intended Funding List should not proceed towards bidding their project until sufficient progress has been made towards obtaining funding and the IEPA has notified them in a Letter of Commitment that funds are available for their project.*

Projects which achieved Project Plan approval by March 31, 2021, and are scheduled to initiate construction prior to March 31, 2022, have been ranked and scored in accordance with Section 365.345 of the Loan Rules and are eligible for the Intended Funding List per 35 Ill. Adm. Code Part 365.340. Applicants with a higher priority score will be ranked higher than applicants with a lower priority score. The total costs of projects on the Intended Funding List shall not exceed the total amount of funds available.

The Intended Funding List (IFL) is a subset of the PPL. In accordance with the Loan Rules, loan funds will be reserved for projects on the IFL through December 31, 2021. After January 1, 2022 projects on the IFL may be “bypassed” as detailed below. A project that is bypassed does not lose its eligibility for funding; however, funds for a bypassed project are no longer held in reserve and may thereafter, during the bypass funding period (January 1, 2022 through June 30, 2022), be awarded to any other project on the PPL that meets the criteria for loan award per Section 365.350 of the Loan Rules. Projects will be funded in the order in which the requirements of Section 365.410 of the Loan Rules are completed.

### Project Bypass Procedure

Per the Loan Rules, after January 1 of each year, the Agency may bypass projects on the Intended Funding List that have not submitted a loan application, obtained all necessary construction permits and demonstrate they will be unable to establish a bid opening date prior to March 31, 2022. The Agency will evaluate projects on the PPL, based upon readiness to proceed as demonstrated by meeting the criteria for loan award per Section 365.350 of the Loan Rules, and offer loan commitments to projects on the PPL to the extent funds are available in the order in which all requirements of Section 365.410 of the Loan Rules are completed. If a project on the Intended Funding List indicates to the Agency between July 1, 2021 and December 31, 2021 that they do not intend to move forward with construction prior to June 30, 2022, the Agency will issue a “bypass letter” to said project making those funds reserved available for other projects.

Another subset of the PPL are those projects which have achieved Project Plan approval but have an anticipated construction start date after March 31, 2022. In accordance with the Loan Rules, funding may not be reserved for these projects due to their anticipated construction start date. Funding may be provided to these projects during the bypass period, or earlier, should available funds exceed the funding requested by projects on the Intended Funding List.



All other projects which submitted a Funding Nomination Form prior to March 31, 2021, but for which Project Plan approval has not been achieved are listed on the PPL in alphabetical order and thereby ranked equally. Projects for which a Project Plan has not yet been submitted have their project number (L17#) listed as “to be determined” (TBD).

Non-Point Source Projects

The following Non-Point Source Projects appear on the Intended Funding List and are anticipated to be funded during FY2022:

Belleville (L175445) – New Relief Storm Sewer and Detention Pond – Anticipated Funding - \$10,400,000

Peoria (L175910) – Combined Sewer Overflow Mitigation – Construct 7 acres of green infrastructure, including permeable pavement and bioswales, and modify existing combined sewers for in-system storage – Anticipated Funding - \$6,270,000

**C. Program Administrative Costs and Fees**

Administrative Costs: The Water Resource and Redevelopment Act allows state Clean Water Programs to establish their annual administrative expenditure levels based on the following criteria:

An amount not to exceed 4.0% of the total of all grants awarded to capitalize the WPCLP, \$400,000 per year, or 1/5% per year of the current valuation of the fund, whichever amount is greatest, is reserved and may be utilized as determined necessary for the reasonable costs of administering the fund and to conduct activities required under Title VI of the CWA:

The total of all grants awarded to capitalize the WPCLP, including the anticipated FY 2021 grant, is \$2,152,559,341 (4% of this total is \$86,102,373). In State FY2022, the program anticipates spending \$5,608,766 on administrative expenses from Fund equity and will not draw any administrative costs from the Capitalization Grant. The program estimates total administrative expenditures since the beginning of the loan program will total \$68,699,908 at the end of June 30, 2022.

<b>Banked Administrative Set-Aside</b>	<b>Amount</b>
4% of all Capitalization Grants	\$86,102,373
Historical Administrative Outlays	(\$68,699,908)
<b>Projected June 30, 2022 Administrative Banked Balance</b>	<b>\$17,401,465</b>

Loan Support Program: The Illinois EPA has operated and maintained a Loan Support Program (LSP) outside the Federal SRF since 1996. The LSP is maintained as a single entity in Illinois statute, but the Illinois EPA accounts separately for funds attributable to WPCLP and PWSLP loans. The LSP is financed by the loan support portions of the fixed loan rate, with that portion currently established at 50% of the fixed loan rate in the WPCLP and the PWSLP. To date, the LSP has been used primarily to finance the reasonable costs incurred by the Illinois EPA for functions that support the management of the Water Revolving Fund, which is the financial mechanism used in

administering Illinois' SRF programs.

Estimated WPCLP operational outlays for the Illinois EPA's Division of Water Pollution Control are projected to total \$10,399,892 and be dedicated primarily to activities in support of the SRF programs, including compliance, permitting and field operations activities. These costs are separate and distinct from the administrative fees of the WPCLP. The program plans to use \$1,500,000 of support fees to match the annual 319 (h) grant.

<b>WPCLP Loan Support – Balance/Receipts/Outlays</b>	<b>WPCLP Loan Support</b>
Balance July 1, 2021	\$ 30,138,396
Estimated FY2022 Receipts	\$ 26,571,496
Operational Outlays	\$ (10,399,892)
Transfer to Loan Program to Provide State Match	\$ (0)
IGIG Grant Funding (Balance of Previously Committed Grants)	\$ (0)
Match for 319(h) Grants	\$ (1,500,000)
Estimated WPCLP Loan Support Balance June 30, 2022	\$ 44,810,000

#### **IV. Program Management**

One of the purposes of the IUP is to facilitate the planning and administration of the WPCLP. The following highlights some program aspects most notable to applicants as well as the Agency.

##### **A. Principal Forgiveness, Interest Rate and Loan Term Determinations**

Loan Program staff routinely discuss principal forgiveness, interest rates and loan terms with loan applicants. Staff complete an internal checklist using the loan applicant's information to determine if an applicant qualifies for principal forgiveness, which interest rate an applicant qualifies for and the maximum term for the loan agreement. The principal forgiveness, interest rate and loan term are finalized at the time of loan agreement execution, following bidding of the contract and prior to the commencement of construction activity.

##### **1) Principal Forgiveness**

The WPCLP can offer a reduction to the amount of principal that an applicant would otherwise need to repay for its project. This reduction is called "principal forgiveness," per federal statute. Although the name is different, in practical application, principal forgiveness functions much like a grant *i.e.*, the eligible capital costs of the project are reduced by the principal forgiveness amount, thereby eliminating a portion of the principal (and interest) that the borrower must repay.

The WPCLP can provide a maximum of \$28,744,300 in principal forgiveness in FY 2022. \$26,744,300 of principal forgiveness assistance awards will follow the terms outlined in Appendix C, but in accordance with Section 365.250(c) of the Loan Rules, a cap of \$5,000,000 in principal forgiveness per loan recipient will be put in place. The cap is being put in place due

to the unprecedented program capacity level and the corresponding number of projects that qualified for the Intended Funding List as well as for principal forgiveness. Projects which were limited by the cap have the option of phasing their construction activity over multiple fiscal years to try and maximize the amount of principal forgiveness that can be obtained. The Agency anticipates a cap on the amount of principal forgiveness that one loan recipient can obtain in future years will remain in place.

As projects on the Intended Funding List that qualified for principal forgiveness are bypassed, those funds will be made available, with priority given to the project with the higher loan priority score, to the next applicant which qualifies for a Letter of Commitment in accordance with Section 365.355 of the Loan Rules, excluding Section 365.355(a)(2).

*Wastewater Treatment Facility Compliance Assistance Principal Forgiveness* – In addition to the principal forgiveness discussed above, Illinois EPA will make \$2,000,000 in principal forgiveness available for loan applicants who own and operate a wastewater treatment facility whose project would result in the consolidation of two or more wastewater treatment facilities. The funded project must result in the elimination of the NPDES Permit for the wastewater treatment facility meeting the following requirements:

- 1) The Agency has initiated an enforcement action against the wastewater treatment facility owner under Section 31 of the Illinois Environmental Protection Act.
- 2) The wastewater treatment facility is chronically in significant non-compliance with its NPDES Permit effluent limits, as defined by the Technical Review Criteria (TRC) in Appendix A of 40 CFR Part 123.45.
- 3) The wastewater treatment facility has an NPDES Permit Design Average Flow of less than one-million gallons per day.

Illinois EPA will make \$2,000,000 in principal forgiveness available for these projects in FY2022. Applicants will be scored and ranked for priority in accordance with 35 Ill. Adm. Code Part 662.345. No applicant can receive more than \$1,000,000 in wastewater treatment facility compliance assistance principal forgiveness in FY2022.

If wastewater treatment facility compliance assistance principal forgiveness funding is not expended, it may be used to provide disadvantaged community principal forgiveness. Loan recipients may receive both disadvantaged community principal forgiveness and wastewater treatment facility compliance assistance principal forgiveness. When applicable, Illinois EPA will first apply the disadvantaged community principal forgiveness to a project, up to the maximum amount allowed, and then apply the wastewater treatment facility compliance assistance principal forgiveness, up to the maximum amount.

## 2) Interest Rate and Loan Term Determinations

The Loan Rules provide for a fixed loan rate that shall be established annually at one-half the market interest rate. Specifically, the fixed loan rate is defined by rule as one-half the mean interest rate of the 20 General Obligation Bond Buyer Index from July 1 to June 30, in the preceding State FY, rounded to the nearest .01%. Current Loan Rules establish a new interest rate each July 1 for the following State FY. Based on bond rates through June 2021, the fixed loan rate for loans executed by Illinois EPA from July 1, 2021, through June 30, 2022 will be 1.11%.

The Loan Rules allow for reduced interest rates, based upon certain criteria, as well as the possibility for a maximum term of up to 30 years from the initiation of operation, with initial repayments of principal to commence within one year of the initiation of operation. The fixed loan rate is a simple, annual rate. The applicable sections of the Loan Rules governing interest rates and repayment period are below:

### **Section 365.210 Fixed Loan Rate**

The interest rate of the loan agreement shall be a fixed loan rate and shall be established as follows:

- a) Base 20 Year Rate – Loan agreements with a repayment period not to exceed 20 years shall have a fixed loan rate equal to 50% of the market interest rate (mean interest rate of the 20 General Obligation Bond Buyer Index, from July 1 through June 30 of the preceding State fiscal year rounded to the nearest 0.01%).
- b) Small Community Rate – Public loan applicants with a service population less than 25,000 that also meet any one of the following three criteria qualify for a fixed loan rate equal to 75% of the Base 20 Year Rate:
  - 1) The median household income of the public loan applicant’s service population is less than the statewide average.
  - 2) The unemployment rate of the public loan applicant’s service population is greater than the statewide average.
  - 3) The public loan applicant’s annual user charge, based upon the average monthly bill of the public loan applicant’s residential customers, is greater than 1.0% of the median household income of the public loan applicant’s service population.
- c) Hardship Rate – Public loan applicants with a service population less than 10,000 that also meet any one of the following three criteria qualify for a fixed loan rate of 1.0%:
  - 1) The median household income of the public loan applicant’s service population is below 70% of the statewide average.
  - 2) The unemployment rate of the public loan applicant’s service population is at least 3.0% greater than the statewide average.
  - 3) The public loan applicant’s annual user charge, based upon the average monthly bill of the public loan applicant’s residential customers, is greater than 1.5% of the median household income of the public loan applicant’s service population.
- d) Environmental Impact Discount – When at least 50% of the eligible project costs fund any of the following components, the loan applicant shall receive a 0.2% discount from the rates established in subsection (a), (b), or (c):

- 1) new projects for the collection or treatment of unsewered communities;
- 2) projects involving nutrient removal or nutrient loss reduction;
- 3) green infrastructure projects;
- 4) projects lowering water demand; or
- 5) projects reducing energy demands at a wastewater treatment facility.

**Section 365.220 Loan Repayment Period**

- a) Except as provided in subsections (b) and (c), the loan repayment period cannot exceed the lesser of 20 years beyond the initiation of operation date, 20 years beyond the initiation of the loan repayment period, or the projected useful life of the project to be financed with proceeds of the loan.
- b) For public loan applicants that qualify for the Small Community Rate or Hardship Rate as defined in Section 365.210, the loan repayment period cannot exceed the lesser of 30 years beyond the initiation of operation date, 30 years beyond the initiation of the loan repayment period, or the projected useful life of the project to be financed with proceeds of the loan.
- c) The Agency may require a loan repayment period term of less than the maximum. In evaluating the appropriateness of alternative loan terms, the Agency shall consider such factors as the scope of the proposed project, the impacts of alternative loan terms on user fees, and the overall cost of the project.

<b>V.</b>	<b>Federal Assurances</b>
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Illinois EPA provides the following assurances and certifications to the U.S. EPA as a part of the IUP. Illinois EPA agrees to the following as required by the CWA, the WPCLP Operating Agreement with the U.S. EPA, and as conditions of the grants to capitalize the WPCLP.

**A. 602(a) - Environmental Reviews**

The Illinois EPA will conduct environmental reviews for all projects as specified in its Operating Agreement with the U.S. EPA and specified in Part 365 of the Procedures for Issuing Loans from the Water Pollution Control Loan Program. The procedures establish a methodology to assure that loan funded projects are environmentally acceptable.

**B. 602(b) (4) - Expeditious and Timely Expenditures**

Illinois EPA will expend all funds in the WPCLP in a timely and expeditious manner.

**C. 602(b) (5) - First Use for Enforceable Requirements**

The first use requirement has been met in Illinois.

**D. 603(f) - Consistency with Planning Requirements**

Projects constructed in whole or in part with funds directly made available by Federal Capitalization Grants will be required to comply with the following Sections of the CWA, as applicable: 205(j), 208, 303(e), and 319.

**E. 603(d)(1)(E) – Fiscal Sustainability Plan (FSP) Requirements**

All loan recipients will certify that a Fiscal Sustainability Plan has been developed and implemented in accordance with the Water Resources Reform and Development Act of 2014.

**F. 603(b)(14) – Architectural and Engineering Services Procurement Requirements**

Beginning with loan applications received after October 1, 2014, A/E contracts which are funded by Federal Capitalization Grant funds shall be negotiated in the same manner as a contract for A/E services under Chapter 11 of Title 40 of the United States Code, or an equivalent State qualifications-based requirement (33 U.S.C. Section 1382(b)(14)). Many of Illinois’ repeat applicants choose not to borrow money for engineering services. In addition, several municipalities that annually borrow money for ongoing infrastructure projects routinely utilize a quality-based selection process when hiring an architectural or engineering firm. Therefore, Illinois will meet this requirement through equivalency.

**G. 602(b)(13) – Cost and Effectiveness Analysis**

Beginning in Federal FY2016 (October 1, 2015), SRF recipients must certify that the project chosen is the most sustainable and cost-effective (Section 602(b)(13)). All Illinois WPCLP loan recipients must certify that they have selected, to the maximum extent practicable, the project that maximizes the potential for efficient water use, reuse, recapture, and energy conservation.

**H. Program Benefits Reporting**

All funded projects will be reported to the U.S. EPA Clean Water Benefits Reporting (CBR) system on an ongoing basis, as required by U.S. EPA. In addition, Illinois EPA will meet the reporting requirements set forth by the Federal Funding Accountability and Transparency Act (FFATA) and will report annually into the National Information Management System database.

**I. Wage Rates and Standards**

In order to meet a Federal Capitalization Grant condition, the Illinois EPA will require WPCLP projects to comply with the Federal wage and employment standards under the Federal Davis-Bacon Act.

**J. Green Project Reserve**

The Illinois EPA will maintain its commitment to green infrastructure in State FY2021. As in recent years, the Federal FY2020 Capitalization Grant includes a Green Project Reserve (GPR) requirement whereby Illinois EPA must utilize not less than 10% of Capitalization Grant funds to provide continued support for projects or project components focused on “green infrastructure, water or energy efficiency improvements or other environmentally innovative activities”. The WPCLP will maintain compliance with this requirement. The projects which contain GPR components, and the amount of funding provided, will be reported to U.S. EPA via the Clean Benefits Reporting system. Despite uncertainty regarding the Federal GPR requirement, the Illinois EPA is taking steps to institutionalize certain green infrastructure practices and policies in the Illinois SRF programs and encourage green infrastructure practices.

The Illinois EPA has identified the projects below which contain components qualifying for the Green Project Reserve that are likely to receive funding during FY2022. The Illinois EPA will identify the final list of projects and the amount of GPR components funded in the Annual Report.

Bartlett - L170034 - WWTP Upgrades: phosphorous removal; influent screening; replace clarifiers, aeration tanks; upgrade filters; add UV disinfection - \$37,000,000

Collinsville – L173963 - WWTP Upgrades: biosolids handling system improvements, new dewatering feed pumps, covered storage facility, polymer system, lime silo - \$7,100,000

Crest Hill – L175735 - STP Upgrades: biological nutrient removal for phosphorus and ammonia-nitrogen reduction - \$5,300,000

Freeport – L174973 - WWTP Upgrades: enhanced biological phosphorus removal and biologically active filters, new chemical feed building, new secondary clarifiers, UV disinfection - \$16,500,000

Peoria – L175910 - Combined sewer overflow mitigation: construct seven acres of green infrastructure, including permeable paving and bioswales; modify existing combined sewers for in-system storage - \$6,270,000

#### **K. Archeological and Historic Preservation Act of 1974, PL 93-291 *et seq.***

U.S. EPA has determined that the provisions of PL 93-291, also known as the National Historic Preservation Act, must be applied to activities of State revolving loan.

#### **L. Guidelines for Enhancing Public Awareness of State Revolving Fund Assistance Agreements**

U.S. EPA has produced a document titled “Guidelines for Enhancing Public Awareness of SRF Assistance Agreements” (dated June 3, 2015), which outlines the requirement for increased awareness of Federal funding through the DWSRF and CWSRF. These guidelines include options for project “signage”. Illinois EPA has satisfied this requirement by modifying Standard Condition No. 23 within the Loan Agreement, which states:

The loan recipient shall meet a signage requirement by posting a sign at the project site or making an equivalent public notification such as a newspaper or newsletter publication; utility bill insert; or online posting for the project duration. After the signage requirement is met, documentation must be submitted to the Illinois EPA using the Public Notification/Signage Requirement Certificate of Completion.

All loan recipients must submit the certification form prior to the first disbursement of loan funds. All signage must include language that the project is wholly or partially funded with joint funding using both State and Federal funds. (<https://www2.illinois.gov/epa/Documents/epa-forms/water/financial-assistance/srf/signage-form.pdf>)

#### **M. Equivalency**

States can identify a group of loans, the sum of which is equal to the amount of its capitalization grant, to meet crosscutter and single audit requirements. This concept is called “equivalency”. In addition, with the enactment of the Water Resources Reform Development Act equivalency can be

used to meet the “Procurement for Architectural and Engineering Contracts” (A/E) requirement. Illinois considered using equivalency to satisfy the single audit requirements. However, this methodology did not work for the program and the WPCLP continues to require all loan recipients to follow single audit requirements and continues to monitor all loan recipients as required. Illinois has chosen to only use equivalency to satisfy the A/E and FFATA requirement. All other WPCLP projects must satisfy all other crosscutter requirements. IEPA intends to designate two City of Chicago projects, L175800 and L175801 for sewer rehabilitation, with an estimated project cost of \$35,650,000 and \$42,000,000 respectively, to be equivalency projects. Should these projects not close on a loan during the State FY2022, they will be replaced with other projects.

#### **N. American Iron and Steel Requirements**

All WPCLP projects must include the use of American Iron and Steel (AIS) Products requirements in accordance with the Water Resources Reform and Development Act of 2014. Standard Condition No. 18 of all loan agreements obligates the applicant to comply with the AIS requirements. Further guidance on AIS requirements is available on IEPA’s website.

<https://www2.illinois.gov/epa/topics/grants-loans/state-revolving-fund/guidance/Pages/american-iron-and-steel-requirements.aspx>

#### **O. Accounting/Auditing Requirements**

Illinois agrees to use accounting, audit, and fiscal procedures conforming to generally accepted government accounting standards as these are promulgated by the Governmental Accounting Standards Board. Generally accepted government auditing standards are usually defined as, but not limited to, those contained in the U.S. General Accounting Office (GAO) publication “Government Auditing Standards” (1988 revision). Illinois also requires recipients of SRF assistance to maintain project accounts in accordance with generally accepted government accounting standards as these are promulgated by the Government Accounting Standards Board. These accounts must be maintained as separate accounts.



## APPENDIX A: Definitions and Acronyms

Agency - Illinois Environmental Protection Agency. (415 ILCS 5/19.2(a))

BMP(s) - Best Management Practice(s).

Bypass - An action by Illinois EPA to remove a project from funding consideration in a State FY.

Capitalization Grant - The actual Federal funds received by the Agency for deposit into the WPCLP as a result of the Capitalization Grant agreement with U.S. EPA.

Construction - Means any one or more of the following: preliminary planning to determine the feasibility of treatment works, engineering, architectural, legal, fiscal, or economic investigations or studies, surveys, designs, plans, working drawings, specifications, procedures, field testing of innovative or alternative wastewater treatment processes and techniques meeting guidelines promulgated under Section 304(d)(3) of the Clean Water Act, or other necessary actions, erection, building, acquisition, alteration, remodeling, improvement, or extension of treatment works, or the inspection or supervision of any of the foregoing items.

CWA - The Clean Water Act, as amended (33 USC 1251 *et seq.*).

CWSRF - Clean Water State Revolving Fund

Dedicated Source of Revenue - The type of security and the basis of legal authorization that are dedicated by legislative enactment or other appropriate authority along with the applicable revenue source pledged for repayment and recorded in an account for the purpose of loan repayment, which is sufficient to repay the principal and interest on the loan.

Defer - An action by Illinois EPA to delay the scheduled date of loan award for a project to a later month in the State FY and to continue to reserve funds for the project.

Design - All administrative, legal, and engineering tasks, subsequent to Project Plan approval but prior to advertisement for bid proposal, associated with receiving approval of a loan application. This must include the following: surveys, designs, plans, working drawings, specifications, soil investigations and any other tests or process determinations required to establish design criteria, and development of user charge systems and sewer use ordinances.

Director - Director of the Illinois Protection Agency

DWSRF - Drinking Water State Revolving Fund

Energy Efficiency - The use of improved technologies and practices to reduce the energy consumption of water quality projects, including projects to reduce energy consumption or produce clean energy used by a treatment works.

E.O. - Executive Order

EPA - Environmental Protection Agency

Facilities - Equipment or operating systems that are constructed installed or established to serve the particular purpose of mitigating the impacts of sewerage, industrial waste or non-point sources of pollution in a watershed. Facilities may involve stand-alone projects or be involved as component pieces of treatment works. Facilities in the context of the Green Project Reserve will

address green infrastructure, water and energy efficiency improvements and other environmentally innovative activities.

Fixed Loan Rate - Defined by rule as one-half the mean interest rate of the 20 General Obligation Bond Buyer Index from July 1 to June 30, in the preceding State FY, rounded to the nearest .01%. Current Loan Rules establish a new interest rate each July 1 for the following State FY.

Fund - The Water Revolving Fund, as authorized by 415 ILCS 5/19.3, consisting of the Water Pollution Control Loan Program.

FY - Fiscal Year

Green Infrastructure - Includes a wide array of practices at multiple scales that manages and treats stormwater, and that maintains and restores natural hydrology by infiltrating, evapotranspiring and capturing and using stormwater.

GPR - Green Project Reserve, which is the portion of funded projects from the Capitalization Grant, that are required to be documented by the Agency in its Intended Use Plan and Annual Report. These projects address green infrastructure, water and energy efficiency improvements and other environmentally innovative activities as directed by Federal law.

Infiltration - Water other than wastewater that enters a sewer system (including sewer service connections and foundations drains) from the ground through such means as defective pipes, pipe joints, connections or manholes.

Inflow - Water other than wastewater that enters a sewer system (including sewer service connections) from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, stormwaters, surface runoff, street wash water or drainage.

Initiation of Operation - The date that the funded treatment works are in full and sustained operation as planned and designed.

Intended Use Plan - A plan that includes a description of the short- and long-term goals and objectives of the Water Pollution Control Loan Program, project categories, discharge requirements, terms of financial assistance and the loan applicants to be served. (415 ILCS 5/19.2(e))

Interest Rate - The interest rate of the loan agreement shall be a fixed loan rate.

IUP - Intended Use Plan

Loan - A loan made from the Water Pollution Control Loan Program to an eligible applicant as a result of a contractual agreement between the Agency and such applicant. (415 ILCS 5/19.2(c))

Loan Agreement - The contractual agreement document between the Agency and the loan recipient that contains the terms and conditions governing the loan issued from the WPCLP.

Market Interest Rate - The mean interest rate of the 20 General Obligation Bond Buyer Index, from July 1 through June 30 of the preceding State FY rounded to the nearest 0.01%.

Median Household Income or MHI - The median household income is the American Community Survey 5-year estimate from the United States Department of Commerce, Bureau of the Census.

Municipality - A municipality as defined in Section 502 of the Federal Clean Water Act. (33 USC 1362(4))

NPS - Nonpoint Source

Operating Agreement - The agreement between the Agency and U.S. EPA that establishes the policies, procedures and activities for the application and receipt of Federal Capitalization Grant funds for capitalization of the WPCLP.

Principal - The total amount of funds distributed to loan recipients for eligible project costs.

Principal Forgiveness - The portion of a loan's principal for which there is no repayment obligation, consistent with the terms of the project's loan agreement.

PPL - Project Priority List, which is an ordered listing of projects developed in accordance with the priority system that the Agency has determined are eligible to receive financial assistance from the WPCLP. (35 Ill. Adm. Code 366)

Public Loan Applicant - A loan applicant that is a municipality, intermunicipal agency, interstate agency, or local government unit that has applied for a loan under the WPCLP.

PWSLP - Public Water Supply Loan Program

Readiness to Proceed - Timely progress toward achieving a binding commitment during the State FY and initiating project activities. This is measured by an applicant's success in meeting all applicable pre-award WPCLP program requirements.

Service Population - The number of people served by the public loan applicant.

Service Revenue - All revenues of the loan applicant that are sufficient to repay the principal and interest (as calculated by the Fixed Loan Rate) on the loan.

SRF - State Revolving Fund

Title VI - Title VI of the Federal Clean Water Act. (33 USC 1251 *et seq.*)

*Treatment Works* – *Treatment works, as defined in section 212 of the federal Water Pollution Control Act (33 USC 1292), including, but not limited to, the following:*

*any devices and systems owned by a local government unit and used in the storage, treatment, recycling, and reclamation of sewerage or industrial wastes of a liquid nature, including intercepting sewers, outfall sewers, sewage collection systems, pumping power and other equipment, and appurtenances;*

*extensions, improvements, remodeling, additions, and alterations thereof;*

*elements essential to provide a reliable recycled supply, such as standby treatment units and clear well facilities;*

*any works, including site acquisition of the land that will be an integral part of the treatment process for wastewater facilities; and*

*any other method or system for preventing, abating, reducing, storing, treating, separating, or disposing of municipal waste, including storm water runoff, or industrial waste, including waste in combined storm water and sanitary sewer systems as those terms are defined in the Federal Water Pollution Control Act.*

[415 ILCS 5/19.2(f)]

Unemployment Rate - The annual average unemployment rate calculated by the Illinois Department of Employment Security's Economic Information and Analysis Division.

Useful Life - The estimated period during which a treatment works is intended to be operable, as certified by the project's consulting licensed professional engineer.

U.S. EPA - United States Environmental Protection Agency.

User Charge - A charge levied on the users of a treatment works to produce adequate revenues for the operation, maintenance and replacement of the treatment works.

WPCLP - Water Pollution Control Loan Program, as authorized by Section 19.2 of the Environmental Protection Act. (415 ILCS 5/19.2)

WRRDA - Water Resources Reform and Development Act of 2014. (P.L. 113-121)

**Appendix B: Principal Forgiveness (Additional Subsidization) Distribution**

**Section 365.250 Additional Subsidization**

- a) The Agency may provide additional subsidization as provided in section 603(i) of the CWA or as otherwise prescribed by USEPA in the annual capitalization grant agreement.
- b) Pursuant to section 603(i)(2) of the CWA, the Agency adopts the following affordability criteria.
  - 1) To be eligible for additional subsidization under section 603(i)(1)(A)(i) of the CWA, a public loan recipient must
    - A) have a service population of 30,000 or less, unless the loan applicant's median household income (MHI) is 70% or less of the statewide average; and
    - B) score at least 21 points based on the following criteria:
      - i) Median Household Income

Points	MHI as % of Statewide MHI
0	Above 100%
5	95-99.99%
10	90-94.99%
15	85-89.99%
20	80-84.99%
25	75-79.99%
30	70-74.99%
35	65-69.99%
40	60-64.99%
45	55-59.99%
50	50-54.99%

55	45-49.99%
60	0-44.99%

ii) Population

Points	Service Population
0	Above 30,000
5	20,000-30,000
10	15,000-19,999
15	10,000-14,999
20	5,000-9,999
25	2,000-4,999
30	1,000-1,999
35	0-999

iii) Additional Criteria

Points	Additional Criteria
1	Unemployment rate is greater than the statewide average unemployment rate by one percentage point or more
4	Decrease in service population greater than 5.0% in the last 5 years from the date of the loan application

- 2) The amount of additional subsidization provided under section 603(i)(1)(A)(i) of the CWA will be capped for qualifying public loan recipients and applied only to eligible projects costs as follows:

<b>Points</b>	<b>Percent</b>
0-20	0%
21-40	up to 15%
41-60	up to 30%
61-80	up to 45%
81-100	up to 60%

- c) Notwithstanding the additional subsidization caps in subsection (b)(2), the Agency may establish a base cap applicable to each loan recipient within its Intended Use Plan each year. The base cap shall be the same amount for each loan recipient receiving additional subsidization. In determining the base cap, the Agency must consider the following factors:
- 1) the amount of federal appropriation allocated to the Agency for additional subsidization;
  - 2) the number of qualifying loan recipients;
  - 3) the availability of equity in the State Water Revolving Fund while ensuring the fund operates in perpetuity; and
  - 4) requirements established by USEPA.
- d) The Agency shall prioritize public loan applicants who score at least 21 points under the affordability criteria in subsection (b), and shall award additional subsidization to loan applicants in the order that loan applicants have been issued a loan by the Agency pursuant to Section 365.410.

## Appendix C: Summary of Public Participation and Public Comments

The Draft 2022 IUP was released for public review on May 27, 2021, thus beginning the 30-day public comment period. The Draft 2022 IUP notice was placed on Illinois EPA's general notice website <https://www2.illinois.gov/epa/public-notices/Pages/general-notices.aspx> and each of the identified stakeholders of the Clean Water State Revolving Fund (SRF) program were also notified by e-mail. The notice directed potential commenters to Barb Lieberoff, Office of Community Relations as the Agency contact for receiving comments and questions pertaining to the Draft 2022 IUP.

A comment was received by USEPA noting a typo on page 4 regarding the amount of the FY2021 federal capitalization grant and a typo on page 6 regarding a date. These items have been corrected.

A few loan applicants provided comments and questions pertaining to the placement of their project(s) on the Project Priority List and/or asked for a clarification on their project's priority scoring. The following adjustments to the Project Priority List were made:

Danville Sanitary District – It was verified that the loan priority score for project L175868 should be 320 points. The project was placed on the Project Priority List accordingly.

Kishwaukee Water Reclamation District – It was verified that the loan priority score for project L175669 should be 500 points. The project was placed in the appropriate place on the Project Priority List.

Various organizations provided comments regarding the project prioritization scoring system and issues related to principal forgiveness parameters. The Agency appreciates all comments received and will take them into consideration when making decisions regarding future operations of the Water Pollution Control Loan Program.



**Appendix D: 2022 Water Pollution Control Loan Program – Project Priority List**

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## Illinois EPA Water Pollution Control Loan Program (WPCLP) FY2022 Project Priority List

### FY2022 WPCLP Intended Funding List (IFL)

Funds Reserved For Projects on the IFL through December 31, 2021

Loan Applicant	L17#	Project Description	NPDES Permit No.	Estimated Construction Start	Projected Loan Amount	Estimated Principal Forgiveness	Loan Priority Score
Bartlett	0034	WWTP Upgrades: phosphorous removal; influent screening; replace clarifiers, aeration tanks; upgrade filters; add UV disinfection	IL0027618	9/15/2021	\$ 37,000,000	N/E	760
Galesburg Sanitary District	3294	WWTP Upgrades Phase I: new UV disinfection system	IL0023141	5/1/2021	\$ 5,468,000	\$ 1,640,400	565
Summerfield	5376	Construct new WWTP, including terminal lift station, replacement lift station, connection with existing interceptor sewer, sand filters, recirculation tanks, control building, associated sitework	IL0064220	10/1/2021	\$ 1,758,000	\$ 791,100	540
LaSalle	3301	Digester conversion, new chlorine contact tank	IL0029424	11/1/2021	\$ 1,200,000	\$ 360,000	530
Buffalo, Dawson, Mechanicsburg SC	5681	WWTP Upgrades: Phase I, Tertiary Filter Replacement	ILG580167	8/1/2021	\$ 1,050,000	\$ 472,500	520
Belleville	5445	New relief storm sewer and detention pond, plus sewer upgrades and manhole pipe rehabilitation	IL0021873	1/1/2022	\$ 10,400,000	N/E	515
Crest Hill	5735	STP Upgrades: biological nutrient removal for phosphorus and ammonia-nitrogen reduction	IL0064998	11/1/2021	\$ 5,300,000	\$ 795,000	510
Metro East Sanitary District	5518	Sanitary sewer rehabilitation	n/a	8/1/2021	\$ 11,800,000	\$ 3,540,000	505
Kishwaukee WRD	5669	Consolidate wastewater systems by extending sanitary sewers, constructing pump stations, & decommissioning existing WWTP plants	IL0023027	9/1/2021	\$ 6,500,000	\$ 975,000	500
St. Charles	5899	Lift station replacement with new pumps, backup generator	IL0022705	3/1/2022	\$ 13,500,000	N/E	495
Pinckneyville	5257	Construct new WWTP, including terminal lift station, headworks, oxidation ditch, clarifiers, digesters, sludge treatment. Decommission two existing WWTPs. Construct headworks and lift station industrial park.	IL0021997, IL0071650	10/1/2021	\$ 17,700,000	\$ 5,000,000	490
Hurst	5743	Lagoon rehabilitation: influent manhole replacement, chlorination/dechlorination system, rock filter modifications	IL0029246	9/1/2021	\$ 435,000	\$ 195,750	485
Freeport	4973	WWTP Upgrades: enhanced biological phosphorus removal and biologically active filters, new chemical feed building, new secondary clarifiers, UV disinfection	IL095297198	3/15/2022	\$ 16,500,000	\$ 4,950,000	470
Sparland	5579	WWTP Upgrades: replace sand filters	ILG580226	8/16/2021	\$ 150,000	\$ 67,500	460
Wyoming	5608	WWTP Upgrades: rehabilitate aerators, sand filters, sludge drying beds	IL0026336	9/30/2021	\$ 1,606,660	\$ 481,998	435
Tilton	3430	WWTP Upgrades Phase II	IL0031429	10/1/2021	\$ 11,000,000	\$ 3,300,000	425
Northern Moraine WRD	5823	Extend Interceptor sewer to connect to WWTP and eliminate a lift station	IL0031933	10/1/2021	\$ 4,000,000	N/E	400
Charleston	5808	Biological Phosphorus Removal	IL0021644	10/15/2021	\$ 6,900,000	\$ 2,070,000	395
Lake Villa	5888	Sewer rehabilitation ahead of highway construction: bypass pumping, refurbishment of sanitary sewer manholes, sewer pipe lining	n/a	9/1/2021	\$ 1,096,000	N/E	395
Northern Moraine WRD	5824	Extend sanitary sewer service to 305 residences in two subdivisions	IL0031933	3/1/2022	\$ 7,000,000	N/E	395
Peoria	5910	Combined sewer overflow mitigation: construct seven acres of green infrastructure, including permeable paving and bioswales; modify existing combined sewers for in-system storage	n/a	2/15/2022	\$ 6,270,000	N/E	395
Assumption	4244	Separate storm and sanitary flows by building new sanitary sewer system	IL0020907	3/1/2022	\$ 4,770,253	\$ 2,105,052	390
Chester	3545	WWTP Upgrades: lift station rehabilitation, new blowers	IL0072931	12/1/2021	\$ 3,701,550	Funding Exhausted	390
Milledgeville	5758	Install cured-in-place lining for sewer mains, manholes. Replace cleanouts and manhole castings and rings.	IL0023345	11/15/2021	\$ 827,000	Funding Exhausted	390
Olney	3609	WWTP Upgrades: UV disinfection to satisfy new NPDES fecal coliform limits	IL0048755	12/1/2021	\$ 598,735	Funding Exhausted	390
Wood River	5753	Construct stormwater detention basin, pump station, and force main	IL0031652	7/1/2021	\$ 2,233,246	Funding Exhausted	390
Washington Park	2692	Sewer rehabilitation	n/a	1/3/2022	\$ 2,255,200	Funding Exhausted	385
Bloomington	5683	Phase III sanitary sewer and storm sewer installation to reduce CSO	n/a	3/1/2022	\$ 4,000,000	N/E	375
Marion	4128	Sanitary sewer rehabilitation	IL0029734, IL0030171, IL0035092, IL0030244	10/11/2021	\$ 4,600,000	Funding Exhausted	375
North Shore WRD	4493	WWTP Upgrades	IL0031933	8/1/2021	\$ 4,994,500	N/E	370
Northern Moraine WRD	2930	Build new headworks facility at WWTP	IL0031933	10/1/2021	\$ 2,000,000	N/E	370
East Dubuque	5810	Sanitary sewer replacement and extension	IL0025186	8/3/2021	\$ 2,900,000	Funding Exhausted	365
Durand	5827	WWTP Upgrades: replace main influent lift station pumps and structure, replace downstream valve and valve vault	ILG582019	8/16/2021	\$ 1,685,980	Funding Exhausted	355
Chicago	5801	Sewer rehabilitation continuation	n/a	8/30/2021	\$ 24,000,000	N/E	345
Chicago	5800	Sewer rehabilitation	n/a	11/30/2021	\$ 33,428,649	N/E	345
Chicago	5799	Large diameter sewer lining continuation	n/a	9/30/2021	\$ 35,525,000	N/E	345
Chicago	5798	Large diameter sewer lining	n/a	9/30/2021	\$ 57,046,351	N/E	345
MWRDGC	4620	Sludge pipeline replacement	IL0028088	3/5/2021	\$ 18,158,800	N/E	340
Gilman	5815	Sewer main replacement	IL0025062	2/14/2022	\$ 1,650,000	Funding Exhausted	335

Highland	5740	Trunk sewer rehabilitation, install SCADA monitors	IL0029173	8/2/2021	\$ 2,800,000	Funding Exhausted	335
St. Clair Township	5777	New WWTP	IL0048232	3/1/2022	\$ 6,302,000	Funding Exhausted	325
Glenbard Wastewater Authority	5771	Rehabilitate primary clarifiers at WWTP, including sludge pumping equipment, electrical and control systems	IL0021547	1/1/2022	\$ 2,500,000	N/E	320
Danville Sanitary District	5868	WWTP Upgrades: digestion complex upgrades, aeration system, blower building, primary treatment and generator improvements	IL0020788	10/15/2021	\$ 12,465,000	Funding Exhausted	320
Rock River WRD	5882	Nutrient removal facility improvements Phase I: replace clarifiers with new filter units, plus associated piping, valving, HVAC, electrical, instrumentation	IL0027201	11/29/2021	\$ 31,777,600	N/E	315
Collinsville	3953	WWTP Upgrades: biosolids handling system improvements, new dewatering feed pumps, covered storage facility, polymer system, lime silo, side stream treatment	IL0028215	9/1/2021	\$ 7,100,000	N/E	305
Stockton	5997	WWTP Upgrades Phase II	IL0025267	9/1/2021	\$ 16,575,000	Funding Exhausted	305
Evanston	5241	Sewer rehabilitation	n/a	9/1/2021	\$ 2,000,000	N/E	295
Flossmoor	3973	Phase IV Sanitary Sewer System Rehabilitation: sewer relining	n/a	3/1/2022	\$ 1,680,000	N/E	295
Fairmont City	5595	Sewer trunk line rehabilitation	n/a	8/30/2021	\$ 1,300,000	Funding Exhausted	290
Maryville	4777	Sanitary sewer extension, abandonment of pump station	n/a	9/1/2021	\$ 700,000	N/E	290
Kincaid	5878	WWTP Upgrades Phase I: pump station drives, fine bubble aeration system at lagoon. Sanitary sewer cleaning, sewer lining, manhole rehabilitation	IL0048607	9/1/2021	\$ 1,097,000	Funding Exhausted	280
Mount Vernon	3677	Collection system rehabilitation	IL0027341	3/14/2022	\$ 4,500,000	Funding Exhausted	280
Freeport	5707	Sanitary sewer replacement, manhole installation	IL095297198	10/1/2021	\$ 1,800,000	Funding Exhausted	275
Sangamon County WRD	5633	Replace interceptor sewers, upsized sewer mains	IL0021971	1/1/2022	\$ 5,200,000	N/E	270
Sangamon County WRD	5634	WWTP Upgrades: reduce combined sewer overflows by modifying headworks and emergency gates, plus increasing treatment capacity	IL0021971	3/1/2022	\$ 6,930,000	N/E	270
MWRDGC	3807	Stickney WRP: new replacement boilers, control centers, new deaerator, boiler chemical systems, lighting	IL0028053	12/27/2021	\$ 13,000,000	N/E	260
Rochelle	4374	WWTP Upgrades: modify aeration bays for biological nutrient removal, rehabilitate clarifiers, replace sand filters, rehabilitate lagoons, add screening	IL0030741	3/1/2022	\$ 7,038,000	Funding Exhausted	260
Sesser	5903	Phase IV Sanitary Collection System Rehabilitation	IL0031020	9/1/2021	\$ 750,000	Funding Exhausted	255
MWRDGC	5569	WRP Upgrades: install tertiary filter beds and disc filters	IL0036340	10/1/2021	\$ 6,700,000	N/E	240
MWRDGC	5163	Phase 14B sewer rehabilitation	IL0047741	9/15/2021	\$ 13,000,000	N/E	240
MWRDGC	5523	Pump and blower house rehabilitation	IL0028088	9/29/2021	\$ 10,000,000	N/E	240
MWRDGC	2745	WRP rehabilitation: concrete around settling tanks for Battery A (\$7,700,000 of funding requested - funds reserved limited due to program capacity of \$600,000,000)	IL0028053	10/20/2021	\$ 6,391,470	N/E	240
MWRDGC	5574	Service tunnel rehabilitation	IL0028053	11/10/2021	\$ 17,000,000	N/E	240
MWRDGC	5697	Service tunnel rehabilitation at four water reclamation plants	IL0028088, IL0047741, IL0036340, IL0036137	1/20/2022	\$ 4,100,000	N/E	240
Ridgway	5830	Replace sanitary sewer, line sewers and manholes	IL0020079	10/1/2021	\$ 753,000	Funding Exhausted	240
Tolono	5849	WWTP upgrades, sewer extension, lift station rehabilitation, sewer lining and replacement	IL0031453	10/1/2021	\$ 12,530,000	Funding Exhausted	225
Wood River	5839	Separate combined sewers by constructing new storm sewers and expanding existing stormwater detention	IL0031852	1/1/2022	\$ 16,266,343	Funding Exhausted	225
MWRDGC	2742	Boiler replacement and electrical system upgrades	IL0036137	2/17/2021	\$ 13,730,000	N/E	220
MWRDGC	4927	Upper Des Plaines Interceptor 11D Ext C (\$5,500,000 requested, limited due to program funding capacity of \$500,000,000)	IL0036340	3/16/2022	\$ 3,005,663	N/E	220

Projects on the FY2022 Intended Funding List with Funds Reserved Through December 31, 2021 \$ 600,000,000 \$ 26,744,300

Assumption (L174244) limited to \$2,105,052 in principal forgiveness. Additional principal forgiveness may be provided if available when loan executed.

Projects Below Were Scored For Priority But Available Funds Exhausted

Loan Applicant	L17#	Project Description	NPDES Permit No.	Estimated Construction Start	Projected Loan Amount	Estimated Principal Forgiveness	Loan Priority Score
Champaign	5889	New interceptor sewer	n/a	3/1/2022	\$ 4,386,000	N/E	210
O'Fallon	5510	WWTP Upgrades Phase II: aerobic digester, pump station, sludge dewatering building, new filters	IL0021636	12/1/2021	\$ 11,700,000	N/E	205
DuPage County Dept. of Public Works	4261	WRF Upgrades: Phase I, electrical system improvements	IL0031844	9/13/2021	\$ 22,000,000	N/E	195
Northern Moraine WRD	5822	Build new maintenance garage	IL0031933	10/1/2021	\$ 568,500	N/E	50

Total Cost of Projects Scored For Priority but Available Funds Exhausted: \$ 38,654,500

Projects With Planning Approval - Estimated Construction Start After March 31, 2022

Loan Applicant	L17#	Project Description	NPDES Permit No.	Estimated Construction Start	Projected Loan Amount
Crest Hill	2159	STP Upgrades: new preliminary treatment, improvements to phosphorus and ammonia-nitrogen reduction	IL0021121	6/1/2022	\$ 32,900,000
Belleville	5833	Phase II sanitary sewer replacements to relieve overflows	IL0021873	5/1/2022	\$ 250,000
Belleville	5834	Phase III sanitary sewer rehabilitation to relieve overflows	IL0021873	5/1/2022	\$ 2,300,000
Bloomington	5684	Phase IV sanitary sewer and storm sewer installation to reduce CSO	n/a	3/1/2023	\$ 1,900,000
DuPage County Dept. of Pub Works	4262	WRF Upgrades: Phase II, grit screening improvements	IL0031844	7/1/2023	\$ 6,380,000
DuPage County Dept. of Pub Works	4263	WRF Upgrades: Phase III, aeration and secondary treatment improvements	IL0031844	7/1/2023	\$ 15,810,000
DuPage County Dept. of Pub Works	4265	WRF Upgrades: Phase V, phosphorus removal	IL0031844	7/1/2024	\$ 1,120,000
DuPage County Dept. of Pub Works	4266	WRF Upgrades: Phase VI, digestion and dewatering improvements	IL0031844	7/1/2025	\$ 1,180,000
Granite City	4114	WWTP Upgrades: replace clarifiers, sludge handling equipment, sludge thickener equipment	IL0033481	5/1/2022	\$ 16,000,000
Kincaid	5980	Phase II sanitary sewer cleaning, lining, and manhole rehabilitation	IL0048607	7/1/2022	\$ 2,207,000
Kincaid	5981	Phase III sanitary sewer cleaning, lining, and manhole rehabilitation	IL0048607	7/1/2023	\$ 1,092,000
Manhattan	3024	STP Expansion, including new UV disinfection	IL0020222	5/21/2022	\$ 18,500,000
Milledgeville	5896	dome, construct waste sludge lift station, replace motor controls and wiring.	IL0023345	8/8/2022	\$ 2,232,000
MWRDGC	3806	WWTP Upgrade: secondary chemical phosphorus removal system as backup for biological phosphorus removal system	IL0028061	5/9/2022	\$ 14,000,000
MWRDGC	2743	Digester tank rehabilitation, gas piping system and pump replacement	IL0028053	6/4/2022	\$ 11,500,000
MWRDGC	4711	Sewer and manhole rehabilitation	IL0028088	8/17/2022	\$ 22,750,000
MWRDGC	5610	Sewer rehabilitation	IL0047741	9/5/2022	\$ 5,500,000
MWRDGC	2964	Phase II sewer rehabilitation	IL0028053	1/25/2023	\$ 24,700,000
MWRDGC	5904	Replace low voltage pump and blower switchgear, install duct banks	IL0028053	2/15/2023	\$ 6,750,000
New Lenox	1185	New WWRF plus conveyance sewer; decommission existing STP-2, Phase I.	IL0046264	6/6/2022	\$ 91,000,000
New Lenox	6009	WWTP Upgrades: Phase II, new interceptor sewers	IL0020559	1/24/2023	\$ 28,000,000
New Lenox	6010	WWTP Upgrades: Phase III, decommission existing STP-1, new pump station and force main	IL0020559	1/24/2023	\$ 18,000,000
Pingree Grove	5725	WWTP Upgrades: capacity increase	IL0077755	6/1/2022	\$ 28,581,280
Quincy	5527	WWTP Rehabilitation Phase IV	IL0030503	4/4/2022	\$ 7,900,000
Quincy	4137	WWTP Rehabilitation Phase II	IL0030503	4/4/2022	\$ 3,000,000
Quincy	5622	Combined sewer overflow control Phase IV: interceptor point repair	IL0030503	10/3/2022	\$ 1,300,000
Quincy	5621	Combined sewer overflow control Phase III: CSO floatables control systems	IL0030503	10/3/2022	\$ 1,500,000
Quincy	5619	Combined sewer overflow control Phase I: improve sewage treatment works wet weather capacity	IL0030503	10/3/2022	\$ 7,500,000
Quincy	4138	WWTP Rehabilitation Phase III	IL0030503	4/10/2023	\$ 2,000,000
Rochelle	4373	Sewer and manhole lining	IL0030741	3/1/2023	\$ 13,688,800
Sangamon County WRD	5635	Line sewers	IL0021971	4/1/2022	\$ 5,860,000
Sangamon County WRD	5630	WWTP Collection System Upgrades: install new separated sewer for existing detention pond	IL0021989	5/1/2022	\$ 1,480,000
Wood Dale	5848	Stormwater mitigation, Phase IV: new storm sewers, underground storage, lift stations, water quality features, streambank stabilization	n/a	6/1/2023	\$ 15,142,625
Yorkville-Bristol Sanitary District	5821	WWTP Upgrades: new biosolids stabilization process to improve phosphorus removal	IL0036412	9/1/2022	\$ 27,900,000

Projects With Planning Approval - Estimated Construction Start After March 31, 2022 \$ 439,023,705

WPCLP Projects which did not have Planning Approval prior to March 31, 2021

Loan Applicant	L17#	Project Description	NPDES Permit No.	Estimated Construction Start	Projected Loan Amount
Barrington	TBD	WWTP Upgrades: new preliminary treatment building to improve phosphorus and ammonia-nitrogen removal	IL0021598	2/1/2024	\$ 50,500,000
Belleville	5576	Phase V Stormwater Management - new UV disinfection system	IL0021873	10/15/2021	\$ 8,900,000
Bloomington Normal WRD	TBD	WWTP Upgrades Phase I: biological nutrient removal conversion	IL0027731	8/1/2024	\$ 50,000,000
Bloomington Normal WRD	5521	WWTP Upgrades: biological nutrient removal conversion	IL0073504	3/1/2023	\$ 17,000,000
Breese	TBD	WWTP Upgrades: Replace terminal lift station, new moving bed biofilm reactor, tertiary filtration, UV disinfection	IL0022772	6/1/2022	\$ 8,000,000
Byron	TBD	WWTP Upgrades: screens, primary and secondary treatment, new UV system, biological phosphorus removal	IL0027804	5/1/2023	\$ 12,000,000
Calumet City	4728	Detention basin rehabilitation	IL00002861	9/1/2021	\$ 8,890,000
Calumet City	4729	Stormwater pumping station and detention basin rehabilitation	IL00002861	9/1/2021	\$ 5,350,000
Chicago	TBD	Sewer rehabilitation continuation	n/a	6/1/2022	\$ 29,200,000
Coal City	TBD	WWTP Upgrades	IL0028151	8/1/2022	\$ 1,600,000
Cobden	TBD	Sewer main relocation	IL0028169	6/1/2020	\$ 367,150
Cortland	TBD	WWTP Upgrades: Construct closed-loop recycling for the removal of phosphorus, add a secondary clarifier, and remove storage lagoons from main treatment train	IL0079065	4/1/2023	\$ 3,971,000
Danville Sanitary District	TBD	WWTP Upgrades: anaerobic digestion, headworks, primary treatment, sludge thickening, headworks, septage receiving, refine retention basin	IL0020788	10/15/2024	\$ 15,935,000
Dixon	TBD	WWTP Upgrades: new screening, preliminary treatment building upgrades, new UV disinfection system	IL0026450	3/15/2022	\$ 5,000,000
Dowell	TBD	Lift station rehabilitation	n/a	4/1/2022	\$ 238,500
East Cape Girardeau	TBD	Lift station improvements and lagoon rehabilitation	IL0070319	9/1/2022	\$ 749,000
Elmhurst	TBD	WWTP Upgrades: Phase V, rebuild clarifiers and rehabilitate chlorine disinfection equipment	IL0028746	1/17/2024	\$ 16,000,000
Galesburg Sanitary District	5847	WWTP Upgrades Phase IV: flow control between CSO and main plant treatment, screening, O & M and equipment storage buildings, anaerobic digester upgrade	IL0023141	6/1/2022	\$ 28,000,000
Galesburg Sanitary District	5846	WWTP Upgrades Phase III: UV disinfection system, upgrades for biological nutrient removal	IL0023141	6/1/2022	\$ 42,000,000
Geneva	TBD	WWTP Upgrades: sludge thickening and dewatering equipment	IL0020087	9/30/2022	\$ 10,000,000
Glen Carbon	4893	New force main and interceptor pump station	n/a	9/1/2021	\$ 6,000,000
Glendale Heights	6027	WTP Upgrades: phosphorus removal, aerobic digester rehabilitation	IL0028967	10/1/2022	\$ 8,500,000
Greater Peoria SSDD	TBD	Modification of existing regulators, construction of new regulators and throttle pipes to increase capture of combined sewage	IL0021288	TBD	\$ 3,665,000
Jacksonville	5940	WWTP Upgrades Phase I: new headworks	IL0021661	4/1/2022	\$ 11,750,000
Jonesboro	TBD	Lagoon improvements	IL0029319	3/1/2022	\$ 1,342,000
Kankakee River Metropolitan Age	TBD	WWTP Upgrades: expand treatment capacity, including new aeration train, aeration blower, final clarifiers, pump building and pumps, sludge storage	IL0021784	5/1/2025	\$ 32,000,000
Kinkaid-Reed's Creek Conservancy	TBD	Construct new sanitary sewer system for campground, including services and a wastewater treatment facility. Remove existing system.	n/a	3/1/2022	\$ 2,510,000
Leaf River	5705	WWTP Upgrades: new influent station, new influent screen, new building, lagoon upgrades, new aerated rock filter. Plus line sanitary sewer.	IL0029475	3/1/2022	\$ 5,009,000
Lockport	TBD	STP Upgrades: peak design and capacity expansion	IL0029611	7/10/2023	\$ 41,000,000
Macomb	5757	WWTP Upgrades: screens, aeration and mixing, new UV disinfection system	IL0029688	8/29/2021	\$ 3,150,000
Marine Sanitary District	5706	Image, then replace or rehabilitate sewer mains with cured-in-place lining	IL0580228	9/1/2021	\$ 2,000,000
Marseilles	2124	Sewer extension to 12-15 unserved commercial properties and 35-40 residential properties	IL0021059	4/1/2021	\$ 2,450,000
Marshall	5886	Sewer separation and lining, new detention pond and outfall	IL0068365	7/1/2021	\$ 4,909,292
Maryville	TBD	Replace interceptor sewer	n/a	12/1/2023	\$ 1,400,000
Mascoutah	5101	New WWTP	IL0025291	6/1/2021	\$ 15,200,000
Minooka	3888	WWTP Upgrades: equipment replacement of influent pump, VFDs, aeration and digestion blowers, oxidation ditch equipment, diffusers, controls	IL0055913	7/1/2022	\$ 2,996,000
Monmouth	1724	New disinfection facility at WWTP to meet new NPDES permit requirements	IL0036218	6/1/2022	\$ 1,830,000
Mount Vernon	TBD	Sewer rehabilitation and force main replacement	IL0027341	3/14/2022	\$ 4,500,000
Mount Zion	TBD	New sanitary relief sewer to add system capacity. Upgrade lift stations.	n/a	4/1/2022	\$ 750,000
MWRDGC	5838	Combined system overflow prevention: relief structures for existing pumping stations and collection systems. New sewer main and connection structures, rehab of drop shaft	IL0028053, IL0028061, IL0047741	12/19/2021	\$ 7,500,000
MWRDGC	5890	Digester tank rehabilitation, gas piping system and electrical component replacement	IL0028061	3/15/2023	\$ 15,000,000
MWRDGC	5900	Replace concrete deck at pump drop shaft rehab, rehabilitate pipe supports and dresser couplings for discharge headers	IL0028088, IL0047741	11/2/2021	\$ 7,150,000

MWRDGC	TBD	Replace Tunnel and Reservoir Plan project structure control and communication equipment	IL0028061, IL0028053, IL0028088, IL0047741	6/29/2022	\$ 25,000,000
MWRDGC	TBD	Utility tunnel rehabilitation	IL0028061	10/19/2022	\$ 3,100,000
MWRDGC	TBD	Upgrade substations, install new duct banks	IL0028053	2/15/2023	\$ 6,750,000
MWRDGC	4927	Sewer rehabilitation	IL0036340	3/16/2022	\$ 5,500,000
MWRDGC	3801	WRP Upgrades: replace coarse screens	IL0028053	4/26/2021	\$ 6,000,000
Olmsted	6030	Lift station upgrades	ILG580052	8/1/2022	\$ 450,000
Pecatonica	TBD	Sanitary sewer lining and rehabilitation	IL0030571	3/1/2023	\$ 2,000,000
Peru	TBD	Install new trunk sewer	IL0030660, IL0075507	12/1/2021	\$ 4,500,000
Romeoville	3357	Lift station replacement, sanitary sewer and force main replacement	IL0048526	9/1/2021	\$ 3,700,000
Romeoville	TBD	WWTP Expansion	IL0048526	12/1/2022	\$ 10,000,000
Sandwich	5994	WWTP Upgrades: phosphorous removal, including upgrades to oxidation ditches, new chemical feed building, fermentation tank, filtration system	IL0030970	4/30/2022	\$ 10,763,000
Sandwich	5995	Flow monitoring and sewer rehabilitation to reduce infiltration and inflow	IL0030970	4/1/2023	\$ 7,541,000
Savanna	TBD	Lift station upgrades	IL0020541	6/1/2022	\$ 1,100,000
Shelbyville	6007	Phase I basin and combined sewer upgrades: new gravity interceptor and pump station; headworks rehabilitation; new chlorination/dechlorination system; sewer lining and rehabilitation	IL0021890	10/31/2022	\$ 5,120,000
Shelbyville	TBD	Combined sewer facility rehabilitation, lagoon modifications	IL0021890	5/1/2024	\$ 2,888,000
Shelbyville	TBD	Phase III Basin Improvements: sewer interceptor rehabilitation	IL0021890	5/1/2026	\$ 16,500,000
St. Charles	6012	Demolish lift station, construct new wet well and pump, new pumps with instrumentation, new valve and vault	IL0022705	5/23/2022	\$ 727,530
St. Joseph	5790	WWTP Upgrades: new treatment system	IL0023086	11/19/2021	\$ 7,400,000
Stanford	6001	New WWTP and collection system	n/a	4/1/2023	\$ 9,476,000
Tamms	TBD	Lagoon and lift station improvements	ILG580033	4/1/2022	\$ 1,348,500
Thebes	TBD	Lift station and lagoon improvements	ILG580253	10/13/2021	\$ 950,900
Thompsonville	TBD	Replace two sewage pumping stations	IL0072478	2/1/2021	\$ 275,000
Trico Community School District N	5908	Remove and replace STP	IL0049905	10/12/2021	\$ 600,000
Troy	5506	Expand treatment facility and construct new interceptor, eliminate four lift stations	IL00314888	11/30/2022	\$ 19,600,000
Troy	5507	Upgrade facilities for holding stormwater, digester, and sludge storage	IL00314888	11/30/2023	\$ 1,200,000
Troy	5508	Upgrade equipment and storage capacity for sludge processing	IL00314888	6/30/2025	\$ 300,000
Troy	TBD	Upgrade tertiary filters	IL00314888	6/30/2026	\$ 5,500,000
Ursa	4150	WWTP Upgrades: conversion from land application to stream discharge via new lagoon cells, filters, aeration	n/a	7/5/2021	\$ 1,204,710
Vergennes	TBD	WWTP Upgrades: replace sand filters, new pumps and controls	IL0063860	3/1/2021	\$ 230,000
Vermont Sanitary District	TBD	Lift station upgrades, sanitary sewer system surveying	IL0049654	8/1/2021	\$ 815,000
Washington	5813	New sanitary trunk sewer, new pump station	IL0024881, IL0042412	7/1/2021	\$ 13,145,050
Watseka	5002	Separate combined sewers by constructing new storm sewers	IL0022161	3/22/2021	\$ 1,380,000
Westfield	5923	New sewage collection system with grinder pumps, new treatment works with UV disinfection	n/a	9/1/2021	\$ 6,346,000
Wilmette	5654	Reline sanitary sewers	n/a	8/1/2021	\$ 820,000
Wood River	TBD	Expand existing detention basin, construct new detention pond	IL0031852	9/1/2022	\$ 5,500,000
<b>Total Cost of Projects Without Planning Approval Prior to March 31, 2021:</b>					<b>\$ 682,042,632</b>

Projects on the FY2022 Intended Funding List with Funds Reserved Through December 31, 2021	\$600,000,000
Total Cost of Projects Scored For Priority but Available Funds Exhausted:	\$38,654,500
Projects With Planning Approval - Estimated Construction Start After March 31, 2022	\$ 439,023,705
Total Cost of Projects Without Planning Approval Prior to March 31, 2021:	\$ 682,042,632
<b>Total Cost of Projects on FY2021 WPCLP Project Priority List:</b>	<b>\$ 1,759,720,837</b>