

## Attachment C: Bureau of Water

### Illinois Environmental Protection Agency 2012/2013 Performance Partnership Agreement/Performance Partnership Grant

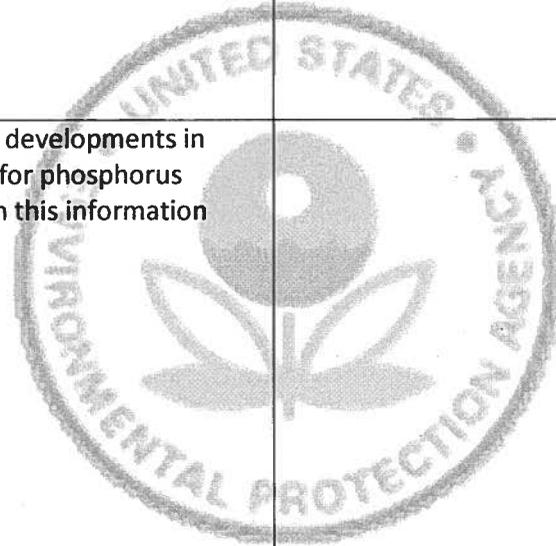
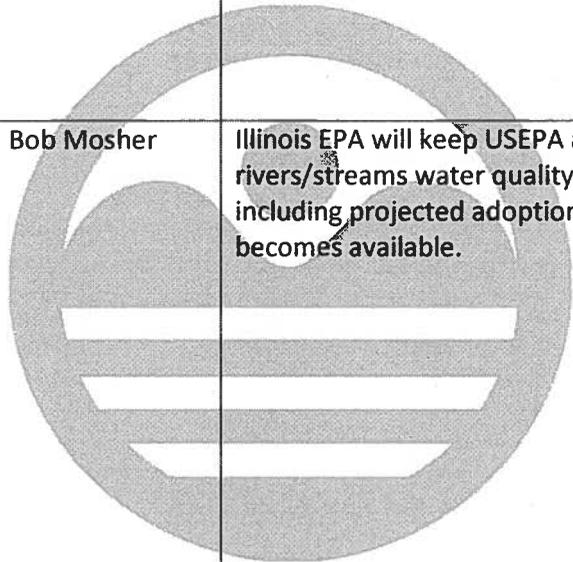
| Strategic Goal 2: Protecting America's Waters             |   |                           |  |   |
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| Strategic Objective 2.1.1: Water Safe to Drink            |   |                           |  |   |
| Work Plan Outputs/Measures/Outcomes – Water 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/Mike Crumly | In FY2012, 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/Mike Crumly | In FY2012, 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 FY2012, 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 FY2012, 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.) |   |

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| 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 FY2012, 95% 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).   | Geoff Andres            |  |  |
| SDW-05  | Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative)  | Geoff Andres            | Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.  |  |
|         |   | Geoff Andres            | By FY2013, Illinois EPA will amend SRF program rules to incorporate priority and eligibility for the "green project reserve" and green infrastructure projects in the SRF Clean Water and Drinking Water programs. |  |
|         |   | Geoff Andres            | Illinois EPA will continue the current practice of "banking" set-aside allotments under the Drinking Water SRF and will evaluate priorities for the utilization of those funds.                                    |  |

|  |                          | Geoff Andres    | In FY2012, Illinois EPA will transition to a new Loan and Grant Tracking System (LGTS); an initiative designed to improving reporting capabilities while increasing program efficiency and security.   |  |
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| <b>Strategic Goal 2: Protecting America's Waters</b>                 |                          |                 |  |  |
| <b>Strategic Objective 2.1.3 Water Safe for Swimming</b>             |                          |                 |  |  |
| <b>Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming</b> |                          |                 |  |  |
| <b>Grant Code</b>  | <b>Template Measures</b> | <b>Contacts</b> | <b>Performance Partnership Agreement<br/>Planned Accomplishments</b>   | <b>Performance Partnership Grant<br/>Status/Progress</b> |
| SS-1   |                          | Amy Dragovich   | <u>Combined Sewer Overflow (CSO) Permits</u> – 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.   |  |
|  |                          | Amy Dragovich   | Illinois EPA and EPA will develop a permitting strategy for excess flow facilities to identify permit requirements for such dischargers, by March 31, 2012. Illinois EPA will implement the strategy in permit actions for these facilities beginning in April 2012.   |  |
|  |                          | Amy Dragovich   | Illinois EPA shall approve the City of Chicago CSO Operational and Maintenance Plans incorporating Region 5's November 12, 2009 comments by January 15, 2012. IEPA 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. |  |
| 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.   |   |
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| <b>Strategic Goal 2: Protecting America's Waters</b>                                    |  |                |  |   |
| <b>Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis</b>            |  |                |  |   |
| <b>Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis</b> |  |                |  |   |
| 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)                                | Geoff Andres   | Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater-facilities and the "green project reserve".  |   |
|   |  | Geoff Andres   | By FY 2013, Illinois EPA will amend SRF program rules to incorporate priority and eligibility for the "green project reserve" and green infrastructure projects in the SRF Clean Water and Drinking Water programs.  |   |
|   |  | Geoff Andres   | In FY 2012, Illinois EPA will transition to a new Loan and Grant Tracking System (LGTS); an initiative designed to improving reporting capabilities while increasing program efficiency and security.  |   |
| 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 submitted Jelkes Creek and Dutchmans Creek Watersheds as new Measure W watersheds. Governor Bond and Pittsfield watersheds have already been approved. |   |
|   | 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.   |   |

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| 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.   |  |
| WQ01b | Number of numeric water quality standards for total nitrogen and total phosphorus at least proposed by States and Territories, or by EPA proposed rulemaking for all waters within the State or Territory for each of the following water body types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280).       | Bob Mosher | Illinois EPA will keep USEPA apprised of developments in rivers/streams water quality standards for phosphorus including projected adoption date when this information becomes available. |  |



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| WQ01c | Number of States & Territories supplying a full set of performance milestone information to USEPA concerning development proposal, and adoption of numeric water quality standards for total nitrogen and total phosphorus for each waterbody type within the State or Territory (annual) (The universe for this measure is 56.) | Bob Mosher | Illinois EPA will continue to provide performance milestone information concerning the development of phosphorus and nitrogen water quality standards in an updated nutrient criteria development plan provided to USEPA no later than August 31, each year.  |  |
|       |  | 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.   |  |
|       |  | Bob Mosher | Will also help in the analysis of data currently being collected by Illinois EPA's Monitoring Unit and organize meetings of the Science Committee.  |  |
| WQ03a | Number and national percent of States & Territories that within the preceding 3 year period, submitted now 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 | <p>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.</p> <p>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.</p> |  |
|       | Human Health Criteria  | Bob Mosher | Illinois EPA will propose updated human health criteria within the triennial review period beginning in FY13.   |  |

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|      | Bacteria Criteria, Recreational Uses and Disinfection Exemptions  | Bob Mosher                              | Illinois EPA will propose an update for bacteria standards to the Illinois Pollution Control Board within three years of final adoption by USEPA.   |  |
|      | Great Lakes Initiative Clearinghouse  | Bob Mosher                              | If any criteria applicable to the Great Lakes are updated, IEPA 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.  |  |
|      |   | Roy Smogor<br>Bob Mosher<br>Scott Twait | Lower Des Plaines River & Chicago Area Waterway UAA<br>Illinois EPA will continue to support completion of the rulemaking and will actively work with USEPA to address concerns raised on proposed rules.   |  |
| WQ05 | Number of States & Territories that have adopted and are implementing their monitoring strategies in keeping with established schedules.<br>Status of Illinois' monitoring strategies and other initiatives | Gregg Good                              | <u>Ambient Water Quality Monitoring Network</u> – Illinois EPA will conduct monitoring activity at 146 ambient stream stations nine times annually (approximately every six weeks).   |  |
|      |   | Gregg Good                              | <u>Intensive Basin Surveys</u> – Illinois EPA will conduct Intensive Basin Survey monitoring activities at approximately 125-140 sites annually. Major river basins planned to be monitored in FY12 include the Pecatonica, Fox, LaMoine, Kaskaskia, and Little Wabash. River basins planned to be monitored in by FY13 include the Rock, Des Plaines, Sangamon, and Big Muddy. |  |
|      |   | Gregg Good                              | <u>Facility-Related Stream Surveys</u> – Report the number of lakes/stations surveys conducted. Illinois EPA will conduct 5-10 facility-related stream surveys annually.  |  |
|      |   | Gregg Good                              | <u>Ambient Lake Monitoring Program</u> – Report the number of lakes/stations sampled. Illinois EPA will conduct monitoring activity at approximately 35-45 inland lakes annually.   |  |

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|  |  | Gregg Good | <u>Volunteer Lake Monitoring Program (VLMP)</u> – Report the number of lakes monitored by volunteers along with a brief status on key accomplishments of the program. 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 | <u>Fish Contaminant Monitoring Program</u> – Report the number of samples processed Illinois EPA and the number of stations sampled by IDNR. Illinois EPA will work cooperatively with the IDNR, IDPH, and IDOA to collect fish from approximately 75-85 waterbody stations, analyzing a total of approximately 375-425 fish contaminant samples annually.                    |  |
|  |  | Gregg Good | <u>Special Surveys</u> – Report the number of special surveys conducted. 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 | <u>Lake Michigan Monitoring Program</u> – 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 | <u>Wetland Assessments</u> - Wetlands assessment commitment: Upon completion of the Wetland Index of Biotic Integrity (w-IBI) developed by the Illinois Natural History Survey (INHS), the Agency agrees to work with INHS and Region 5 to see how best to incorporate the w-IBI into a methodology to assess attainment of wetland use(s) in the 2014 Section 305(b) report. |  |
|  |  | Gregg Good | <u>National Aquatic Resource Surveys</u> – Illinois EPA will participate in the National Lakes Assessment survey with monitoring to take place in Summer 2012. Illinois EPA will make a commitment by approximately September 2012 whether it will participate in the National Rivers and Streams Assessment with monitoring to take place in Summer 2013.                    |  |

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|       |  | Gregg Good                   | <u>STORET</u> – Illinois EPA will continue to submit regular updates of water quality information to STORET via the AWQMS database.  |
|       |  | Gregg Good                   | <u>Water Quality Monitoring Strategy Development 2013-2018</u><br>– 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 April 30, 2013. USEPA’s review comments will be provided back to IEPA by June 30, 2013. The final strategy will be developed by September 30, 2013. |
|       |  | Gregg Good<br>Roy Smogor     | By September 30, 2012, Illinois EPA will make an assessment of the resources necessary to run a level 4 biological assessment program. By June 30, 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 September 30, 2013.  |
| WQ-07 | Number of States and Territories that provide electronic information using the Assessment Database version 2 or later 9 or compatible system) and geo-reference the information to facilitate the integrated reporting of assessment data. | Gregg Good<br>Amy Walkenbach | While acknowledging that the statutory date for submittal of the 305(b) report is April 1, Illinois EPA will provide the draft report, including a populated Assessment Database and geo-reference data, for review and comment by Region 5 and the public by April 1, 2012. The final report will be submitted for USEPA approval by June 30, 2012. For the 2014 cycle, Illinois EPA will implement procedural and scheduling changes in 2013 that will result in a submittal of the 2014 305(b) report to Region for approval by April 1, 2014   |
|       | 303 (d) List Development   | Amy Walkenbach               | <u>303(d) submittal</u> - The draft 303(d) list will be provided to Region 5 and the public for review and comment by April 1, 2012. The final Draft list will be submitted to Region 5 for approval by June 30, 2012.   |

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| 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).  |  |
|        |   | Amy Walkenbach | 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.   |  |
|        |   | 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 | Provide draft TMDLs to Region 5, 30-60 days prior to public notice, or alternate timeframe as agreed upon, for review and comment.   |  |
|        |   | 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.  |  |

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| WQ-14a and WQ-14b       | 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.<br>WQ-14b Number categorical industrial users that discharger to POTWs with non-approved programs. | Roger Callaway | Illinois EPA will enter required data elements into ICIS. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are entered into ICIS. NPDES for annual reports submitted by POTW with approved pretreatment programs. By October 15, 2011, Illinois EPA will provide Region 5 a list of potential categorical and significant industrial users. Region 5 will send letters to industries subject to categorical standards informing them of their responsibilities under the pretreatment rules. Beginning October 1, 2011, Illinois EPA, shall, as a permit condition, require all major municipal permittees without approved programs to identify and report to the Region the number of categorical and significant industrial users they serve. Also, by December 15, 2011, Illinois EPA and Region 5 would work together to finalize a letter that would be sent to minor municipal permittees requiring them to identify and report to the Region 5 the number of categorical and significant industrial users they serve. |  |
|                         | 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.   |  |
| Clean Water Action Plan | Resolve State Review Framework items   | Bruce Yurdin   | By October 15, 2011, U.S.EPA and Illinois EPA will meet to discuss and by December 15, 2011, Illinois EPA will develop a plan for the completion of inspection reports which includes 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.   |  |

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|                        | EPA/State permitting and enforcement joint work plan | Sanjay Sofat                   | U.S. EPA and Illinois EPA, working together, will conduct an annual Clean Water Act planning process. The purpose is to identify and discuss national, regional and state priorities in the context of available resources at both the state and federal levels. The result will be development of a Joint Work Plan consistent with CWA Action Plan guidance to be concluded no later than September 30th. The resulting collaborative annual work plan may include various mechanisms to get work done, such as work sharing, innovative approaches to monitoring facilities or addressing violations. Illinois EPA and EPA will implement the workplans consistent with the timeframes identified in the plans. |  |
| 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<br>Bruce Yurdin | Take appropriate compliance and enforcement actions in accordance with the Illinois EPA's Section 31 of the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations.  |  |
|                        |  | 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.  |  |
|                        |  | Bruce Yurdin                   | 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 FY12/13.  |  |

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| 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. Because of issues raised on nutrient limits based on the Illinois narrative standard and 316(a) thermal demonstrations, Illinois EPA commits that 85% of majors will be current and 80% of minors will be current. Illinois EPA and Region 5 commit to identifying an approach on nutrient limits based on the narrative standard by October 1, 2011 (implementation upon agreement on an approach); EPA meeting its goal of reviewing selected proposed permits within 30 days; and to resolving concerns on three thermal demonstrations by March 1, 2012. Agreement on an approach to implement nutrients limits, resolution of 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". |  |
| WQ-13a |   | Al Keller     | <u>Stormwater</u> – Illinois EPA has reissued the construction site activity, industrial site activity and MS4 stormwater general 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 FFY2012 and 2013 and submit it to Region 5 by August 31 of each year. Issue 100% of the identified priority permits by the end of each FFY.   |  |
|        |   | Al Keller     | <u>Lagoon General Permits</u> – Illinois EPA will submit the 3 general permits for municipal and semi-public lagoon facilities to Region 5 for approval by October 1, 2011. After approval by Region 5, Illinois EPA will public notice the permits for subsequent issuance as soon as possible.  |  |
|        |   | Al Keller     | <u>Permit Backlog List</u> – 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  |  |

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|  |  |                              | 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<br>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. |  |
|  |  | 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 FFY13.  |  |
|  |  | Al Keller                    | Develop a nutrient permitting strategy based on narrative standards by October 1, 2011. Implement the strategy in permit issuances and reissuances beginning in October 2011.   |  |
|  |  |                              | Illinois EPA will continue to work with Region 5 to conduct a Reasonable Potential Analysis for nutrients for the MWRDGC facilities   |  |
|  |  |                              | Within 90 days of Region 5 completing a Reasonable Potential Analysis for nutrients for the MWRDGC facilities, Illinois EPA will propose draft permits for the Stickney, Northside and Calumet WRPs consistent with the analysis.                                       |  |
| 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                  | <u>CAFO rulemaking</u> Illinois EPA will submit the proposed amended CAFO rule and supporting regulatory package to the Illinois Pollution Control Board. .   |  |
|  |  | Bruce Yurdin                 | <u>CAFO Inventory</u> By December 1, 2011, Illinois EPA will provide an inventory of large CAFOs to EPA. By December 1, 2012, Illinois EPA will provide a final inventory to EPA as a   |  |

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|  |  |              | basis for the final Work Load Assessment. The inventory at a minimum should identify facility name and location, owner/operator contact information, types and number of animals. By September 30, 2013, Illinois EPA will provide an updated CAFO inventory that contains the information identified in its plan to create and maintain a comprehensive inventory of CAFOs.                          |  |
|  |  | Bruce Yurdin | <u>CAFO Inventory Update</u> By December 1, 2012, Illinois EPA will provide an update to the CAFO inventory, adding any newly identified CAFOs and/or removing facilities determined not to be large CAFOs. Illinois EPA and EPA will discuss recommended changes to the content of the inventory prior to the December 2012 update.  |  |
|  |  | Bruce Yurdin | <u>CAFO Work load Assessment</u> Six months after the final inventory has been completed, Illinois EPA will provide a final workload assessment based on the CAFO inventory developed per the Work Plan and that incorporates responses to EPA comments on Illinois' August 2011 preliminary workload assessment.   |  |
|  |  | Dan Heacock  | <u>CAFO Training</u> Newly hired Illinois EPA CAFO permit writers will complete an USEPA approved NPDES training program for permit writers within 6 months of start date. Existing EPA CAFO permit writers will complete USEPA approved nutrient management training, subject to availability of USEPA provided training. USEPA will train newly hired permit writers within 6 months of start date. |  |
|  |  | Dan Heacock  | <u>CAFO permit reviews</u> 100%of permit applications received by March 31, 2012 will be acted on in accordance with Illinois EPA's SOP for CAFO applications.  |  |
|  |  | Dan Heacock  | <u>Incomplete CAFO Permit applications</u> - If Illinois EPA refers CAFOs to USEPA for incomplete applications, USEPA will issue information collection orders within 60 days of a referral from Illinois EPA.  |  |
|  |  |              | <u>CAFO Permit Application Tracking</u> Illinois EPA will maintain a CAFO permit tracking system. By the 27 <sup>th</sup> day of every even numbered month Illinois EPA will submit an updated version  |  |

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|  |  |              | of the CAFO Tracker indicating current progress made on permit application reviews and final permit actions.   |
|  |  | Dan Heacock  | <u>CAFO rulemaking</u> Within 45 days after amendatory rulemaking becomes effective, will submit the final amendments to U. S. EPA for action under 40 CFR 123.62  |
|  |  | Dan Heacock  | <u>Inform CAFOs of amended CAFO rule and permit requirements</u> Within 30 days after publication of the amendments, Illinois EPA will inform the owners of each Large CAFO in the state's inventory, in writing, about the need for an NPDES permit for discharges from the CAFO and the consequences for failing to obtain the permit. Illinois EPA will provide a draft of the letter to U. S. EPA for review and approval. |
|  |  |              | <u>Revise permit application</u> Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will revise its permit application forms, as appropriate, based on the amendments and federal regulations.  |
|  |  |              | <u>Propose general permit revisions</u> Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will formally propose for public review and comment draft modifications to the general permit ILA01, as appropriate, based on the amendments and federal regulations.  |
|  |  | Bruce Yurdin | Illinois EPA will enter and maintain inventory of large and medium CAFOs in the Integrated Compliance Information System (ICIS) to the extent that ICIS protocols allow.   |
|  |  | Bruce Yurdin | Perform an additional 25 NPDES evaluations by 6/1/2012 and provide U.S. EPA a copy of the final reports.   |
|  |  | Bruce Yurdin | By September 1 of each year, Illinois EPA will develop an annual site-specific CAFO inspection plan which ensures NPDES inspection at a minimum of 20% of all permitted CAFOs, consistent with U.S. EPA's National NPDES Compliance Monitoring Strategy.   |
|  |  | Bruce Yurdin | Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum Within six months of their start date, and prior to conducting inspections independently  |

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|  |  | Bruce Yurdin | All staff working on AFO/CAFO issues will be trained on the revised ERG.  |  |
|  |  | Bruce Yurdin | Issue VNs for all significant noncompliance detected at CAFOs, within 180 days of Illinois EPA becoming aware of the alleged violation, pursuant to Section 31(a) of the Illinois Environmental Protection Act (Act).   |  |
|  |  | Bruce Yurdin | If Illinois EPA is unable to negotiate an acceptable CCA within 120 days of issuing the VN, Illinois EPA will refer the matter to the Illinois Attorney General's office, States Attorney's office or U.S. EPA.   |  |
|  |  | Bruce Yurdin | For conditions that constitute an imminent or substantial endangerment to human health, the environment or property, immediately refer the matter to the Illinois Attorney General's office pursuant to Section 43 of the Act.  |  |
|  |  | Bruce Yurdin | In cases where the facility does not respond to the VN or proposes a remedy that is less effective than the remedy proposed by Illinois EPA, Illinois EPA will immediately complete the necessary actions under Section 31 that will allow Illinois EPA to formally refer the matter to the Illinois Attorney General's office or the State's Attorney of the county in which the alleged violation occurred. Simultaneously, Illinois EPA will refer the case to its existing Enforcement Decision Group for pre-referral consideration of the case. |  |
|  |  | Bruce Yurdin | Illinois EPA program and legal managers, Illinois Attorney General's office managers, and U.S. EPA program and legal managers will conduct a quarterly docket review of all referred CAFO matters and all open federal enforcement cases.   |  |
|  |  | Bruce Yurdin | Starting October 2011, Illinois EPA will provide a bi-monthly report to the U.S. EPA Water Enforcement Branch. The report will reflect the activities completed during the preceding two month and include element specified in the Illinois CAFO work plan.  |  |

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|  | Supplemental Section 106 Funding workplan | Bruce Yurdin | Illinois EPA did hire two (2) new FTEs in 2011 to complete this Proposal. The new FTEs will be trained in the responsibilities of an Illinois EPA inspector and in the appropriate federal and state laws and regulations governing CAFOs, equipped with the appropriate data collection and recordkeeping tools, and assigned the duty of specific CAFO inspections within a designated region of the state, as described above. The FTEs will conduct CAFO inspections and identify water quality problems, including the location, type and content of all wastewater discharges. It is anticipated that the 80 annual inspections will add to the approximately 220 livestock inspections that are annually conducted. High priority for inspections will be given to unpermitted CAFOs and to emergencies at CAFOs, including those that result in unauthorized discharges and those that endanger public health and the environment. |  |
|  | Inspections                               | Bruce Yurdin | <u>Inspection strategy</u> – An inspection plan 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.  |  |
|  |   | Bruce Yurdin | <u>Frequency of inspecting majors</u> – 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 30 <sup>th</sup> of each year.   |  |
|  |   | Bruce Yurdin | <u>Reconnaissance inspections</u> – Recon inspections will continue, as resources allow.   |  |
|  |   | Bruce Yurdin | <u>Stormwater inspections in conjunction with SWCDs</u> - 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.   |  |

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|                | Work towards science-based standards (nutrients, bacteria, boron, fluoride, manganese) and more accurate use of classifications. | Bob Mosher      | 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 for mutual agency agreement, as needed each summer if there has been slippage to major milestones in the 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. |  |

