

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)**

Fiscal Year 2012-2013

(October 1, 2011 to September 30, 2013)

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

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

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

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

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

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

- (1) Promote clear understanding of both State and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.

- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM

CORE STATE ACTIVITIES

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent State decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

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

CORE R5 ACTIVITIES

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

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

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

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

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

Acronyms/Abbreviations	
ACS – Annual Commitment System	MRDL – Maximum Residual Disinfectant Level
ARDP – Annual Resource Deployment Plan	NCWS – Non-Community Water System
As – Arsenic	NPDWR – National Primary Drinking Water Regulation
CCR – Consumer Confidence Report	NTNCWS – Non-Transient Non-Community Water System
CFR – Code of Federal Regulations	OCCT – Optimal Corrosion Control Treatment
CPE – Comprehensive Performance Evaluation	pCi/L – picoCurie per liter
CTA – Comprehensive Technical Assistance	PN – Public Notification
CWA – Clean Water Act	ppb – part per billion
CWS – Community Water System	PWS – Public Water System
DBP – Disinfection By-Products	PWSID – Public Water System Identification
D/DBPR – Disinfectants and Disinfection By-Products Rule	PWSS – Public Water System Supervision
DWA – Drinking Water Academy	Rads – Radionuclides
DWSRF – Drinking Water State Revolving Fund	RTC – Returned to Compliance
eDV – Electronic Data Verification (Tool)	SDWA – Safe Drinking Water Act
EnPPA – Environmental Performance Partnership Agreement	SDWIS/FED – Safe Drinking Water Information System/Federal
ERG – Expense Reimbursement Grant	SDWIS/State – Safe Drinking Water Information
ERP – Enforcement Response Policy	

<p>ETT – ERP Enforcement Targeting Tool FBRR – Filter Backwash Recycling Rule GWR – Ground Water Rule GWS – Ground Water System GUDI – Ground Water under the Direct Influence of Surface Water HAA5 – Haloacetic Acids HSA – Hydrogeologic Sensitivity Assessment IDSE – Individual Distribution System Evaluation IESWTR – Interim Enhanced Surface Water Treatment Rule IOC – Inorganic Contaminant IUP – Intended Use Plan LCR – Lead and Copper Rule LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule MCL – Maximum Contaminant Level M/R – Monitoring/Reporting</p>	<p>System/State SNCs – Significant Non-Compliers SOC – Synthetic Organic Contaminant SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule SWAP – Source Water Assessment Program SWP – Source Water Protection SWTR – Surface Water Treatment Rule TCR – Total Coliform Rule TMDL – Total Maximum Daily Load TT – Treatment Technique TTHM – Total Trihalomethanes UCMR – Unregulated Contaminant Monitoring Rule V&E – Variances and Exemptions VOC – Volatile Organic Contaminant WBDO – Waterborne Disease Outbreak WQP – Water Quality Parameter</p>
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Attachment A: Linking the Strategic Plan to this Work Plan	Error! Bookmark not defined.6

**Attachment B: Unregulated Contaminant Monitoring Rule
(UCMR) Partnership Agreement**
Illinois Environmental Protection Agency
U.S. Environmental Protection Agency Region 5
PARTNERSHIP AGREEMENT for the IMPLEMENTATION of the
UNREGULATED CONTAMINANT MONITORING REGULATION (Cycle 3)

BACKGROUND

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

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

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

PURPOSE

This PA is intended to support the implementation of the UCMR by identifying the key implementation activities which will be performed by the State for the third UCMR monitoring cycle (UCMR3). While States are not responsible for implementing the UCMR, the Association of State Drinking Water Administrators (ASDWA) and the EPA encourage States to assist the EPA to the extent feasible as the activities in this PA are

implemented. The principal agent within the EPA's OGWDW charged with implementation responsibility for the UCMR is the Technical Support Center (TSC), located in Cincinnati, Ohio. A key role of the EPA Regional Office is to establish an agreement with States; identifying what each State will do to implement specific provisions of the regulation. The extent to which the State engages in implementing the UCMR jointly with the EPA will depend on many considerations. If a State wishes to participate in UCMR implementation, the State must agree to carry out the review of the initial State Monitoring Plan, as provided in Section 1445(a)(2)(C)(i) of SDWA. This role is provided in Part 1, Necessary Responsibilities, of the attached agreement. The State may elect to assume additional responsibilities over and above those identified in Part 1 in assisting the EPA's direct implementation responsibility for the UCMR. These other responsibilities are identified in Part 2, Supplemental Responsibilities. These are to be determined through discussions between Regions and each State.

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

RATIONALE

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

LIMITATIONS

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

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

MODIFICATION NOTIFICATION

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

UCMR IMPLEMENTATION: ROLES AND RESPONSIBILITIES

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

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

Part 1 - Necessary Responsibilities

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

Part 2 - Supplemental Responsibilities

2. Provide (or ensure) the proper PWS inventory data (PWSID, facility ID and sample point ID) for each PWS to use for reporting their monitoring data in the Safe Drinking Water Accession and Review System (SDWARS). This may include initially providing the complete inventory and correcting or adding facilities and/or sample points, when necessary.
3. Review representative sampling plans for reduced monitoring submitted by PWSs with groundwater sources that have multiple entry points to the distribution system. Inform the EPA of the State's approval, modification, or disapproval. **If the EPA does not receive your recommendation within 60 days of your receiving the PWS's proposed representative groundwater wells monitoring plan, then the EPA will assume State concurrence.**
4. Notify large PWSs of their Assessment Monitoring and/or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify large systems.**
5. Notify small PWSs that are part of the final SMP of their Assessment Monitoring or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify small systems.**
6. Notify the EPA/TSC at least 6 months before monitoring is to occur that the State will perform the sampling for the small PWSs in the SMP for Assessment Monitoring and/or Screening Surveys. **If the EPA does not hear from you by this deadline, then the EPA will assume the PWSs will perform the sampling.**
7. Specify an alternate monitoring date, if the State is going to collect samples for small PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**
8. If the State is going to collect large PWSs samples, assign the monitoring schedule for the large PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**

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

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.1 – Adopt all rules in a timely manner (within two year extension period).</p> <p>Issue: “There are concerns that the emerging technologies associated with LT2SWTR (ultraviolet light disinfection and membrane filtration specifically) are increasingly difficult due to their complexity and lack of staff capable of devoting sufficient time to study the issues.</p> <p>Additional staff in the Permit Section is desirable to devote adequate resources to them.”</p> <p>The state has identified this issue in their 2010 Joint Evaluation and will discuss alternatives.</p>	<p>Illinois EPA has adopted the rules above and is implementing provisions of the rules thru inspections and providing training, technical assistance and taking enforcement actions as necessary.</p>	<p>Region 5 is currently processing the primacy approval for LT2/Stage2.</p>	
<p>1.2 – Notify all surface water and GUDI systems of their regulatory requirements.</p>	<p>Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.</p> <p>NCWS Monitoring schedules will be available on-line when IDPH has Drinking Water Watch up and running – projected date is the end of 2012.</p>	<p>As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.</p> <p><i>NOTE: The next update for SDWIS/State will contain compliance modules for Stage 2 and LT-2 rules.</i></p>	<p>Data is maintained in SDWIS/State.</p>		
<p>1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.</p>	<p>Data is maintained in SDWIS/State and will be used to update SDWIS/FED.</p>	<p>► R5 will evaluate extent to which LT2 violations are reported to SDWIS/FED.</p> <p>New Rule Violations as of April 2011 (2008-2010 data) – M/R – LT2 ESWTR - 1</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Illinois has committed to completing 95% of the surface water sanitary surveys under the national measures.</p>	<p>Provide training, as requested.</p> <ul style="list-style-type: none"> ▶ Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years). <p>As of April 2011 (2008-2010 data)</p> <p>CWS - 48 not completed, 528 completed, 576 total systems. 91.7%</p> <p>NTNCWS – 1 not, 6 completed, 7 total. 85.7%</p> <p>TNCWS - 1 not, 113 completed, 114 total. 99.1%</p> <p>This national measure will be finalized in July 2011. It will be measured again in July 2012 for the period of 2009 to 2011.</p>	

Table 1. Primacy Activities

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

Table 1. Primacy Activities

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

Table 1. Primacy Activities

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

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>2.5 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Groundwater Section staff are updating source water assessments and Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.</p>		
2.6 – Follow-up on all M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

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

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.</p>	<p><i>States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality. The Illinois EPA has not yet encountered limitations.</i></p>	<p>Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.</p>	
<p>3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.</p>	<p>Data will be tracked in SDWIS/State and transferred to SDWIS 3.0 when available.</p>	<p>► Region 5 will evaluate extent to which GWR violations are reported to SDWIS/FED.¹</p> <p>New Rules: Violations as of April 2011 (2008-2010 data)</p> <p>M/R – GWR – 2 Other – GWR – 1</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p> <p>Issue: (same issues regarding staff resource as in LT2SWTR in 1.1)</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Reports will be made as resources allow.</p>	<p>► R5 will measure completeness of sanitary surveys within evaluation time period (three or five years).²</p> <p>As of April 2011 (2008-2010) data</p> <p>CWS – 174 not, 992 completed, 1166 total. 85.1%</p> <p>NTNCWS – 11 not, 359 completed, 370 total. 97.0%</p> <p>TNCWS – 48 not, 2854 completed, 2902 total. 98.3%</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	Treatment will be required when necessary to ensure a multi-barrier protection strategy at all community water supplies in Illinois.		
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	IEPA is implementing a groundwater rule implementation strategy approved by Region 5. IDPH will implement the triggered source water monitoring requirements by the compliance date specified in the GWR.		
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	See 3.7 above.		
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ongoing – follow up actions will be taken as appropriate.		
3.10 – Follow-up on corrective action consultation and reporting violations.	Ongoing – follow up actions will be taken as appropriate.		
3.11 – Follow-up on M/R violations.	Ongoing – follow up actions will be taken as appropriate.		
3.12 – Follow-up on public notification violations.	Ongoing – follow up actions will be taken as appropriate.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ongoing – follow up actions will be taken as appropriate.		

Table 1. Primacy Activities

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

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).	IPCB has adopted the LCR short term and minor revisions and the rules are being implemented. IDPH has submitted milestone data to the ODS and will continue updating data.	Provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012).	
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	IPCB has adopted the LCR short term and minor revisions and the rules are being implemented.		
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90th percentile action level sample data for all large and medium sized systems, and 90th percentile action level exceedance sample data for small systems.</p>	<p>Ongoing – will continue. Tracked in SDWIS/State.</p>	<p>Region 5 will finalize the LCR module of the compliance determination and violation reporting training (CDVRT).</p> <p>▶ Region 5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.¹</p> <p>New Rules: Violations as of April 2011 (2008-2010 data)</p> <p>M/R - LCR - 72</p> <p>▶ Region 5 will evaluate completeness of reporting LCR 90th percentile action level sample data.</p> <p>Report as of April 2011 (2008-2010 data) –</p> <p>CWS – 438 – 100% complete.</p>	
<p>5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.</p>	<p>Ongoing – will continue. Tracked in SDWIS/State.</p>		
<p>5.7 – Follow-up on all M/R violations.</p>	<p>Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	
<p>5.8 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.</p>	<p>Ongoing- will continue.</p>	<p>Region 5 will assist as necessary, or as requested.</p>	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
5.9 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.		Headquarters to provide training to R5 states on setting appropriate optimal water quality parameter (OWQP) ranges in R5 office during Summer 2011.	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted LT2 & Stage 2 rules and IEPA & IDPH are in the process of implementing the regulations.	Train state staff about Stage 2 D/DBPR by offering in-state and/or regional training opportunities. As noted in 5.1, provide training for states on treatment changes that could affect lead levels (focus on chlorine and chloramines, in anticipation of Stage 2 compliance in 2012). EPA-HQ will provide a webinar in August 2011 on Stage 2 compliance, including transition issues.	
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	Region 5 will handle and close out all enforcement actions that we've initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	Data will be maintained in SDWIS/ State		
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State	Stage 2 Data Entry Instructions (DEI) was provided to the states on February 10, 2011. ► Region 5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED. ¹	
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.6 – Follow-up on all other MCL/MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.8 – Follow-up on all M/R violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Ongoing – will continue		
6.10 – Follow-up on all other reporting requirement violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
7.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted IOC Rules and they are being implemented (including arsenic).		
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.	Ongoing – will continue. Tracked in SDWIS/State.		
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
7.5 – Follow-up on MGL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
7.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.1 – Adopt all rule changes in a timely manner (within two year extension period).	IPCB has adopted Radionuclide Rules and they are being implemented.	R5 plans to distribute a gross alpha holding time report by December 2011.	
8.2 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
8.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Ongoing – will continue.		
8.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Ongoing – will continue. Tracked in SDWIS/State.		
8.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	
8.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

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

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.	Ongoing – will continue. Tracked in SDWIS/State		
10.3 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State		
10.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	
10.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	
Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
11.0 – Organic and Inorganic Chemical Monitoring Waiver Program			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.	<p>Changes to the approved program not needed during 2010.</p> <p>Applicable system's waivers will be evaluated during 2011 for the January 1, 2011 thru December 31, 2013 compliance period.</p>		

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

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

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – CCR			
14.1 – Notify all regulated water systems of their CCR requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Ongoing – will continue.		
14.3 – Electronically report all CCR violations to SDWIS/FED.	Ongoing – will continue. Tracked in SDWIS/State.		
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – Laboratory Certification			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the <u>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>Issue: “State travel restrictions continue to prevent the training of additional staff to provide back-up for conducting the on-site laboratory assessments”</p>	<p>Illinois does require that all laboratories be certified for SDWA sample result submission and certification occurs every two years. The laboratories are certified to NELAC standards which are equivalent to the EPA Manual. At this time, third parties are not being used to conduct on-site visits.</p>	<p>The Region will assess the State labs and the State certification programs in FY 2012.</p>	

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p>	<p>IEPA and IDPH commit to participate in the November 28 – December 1, 2011, PWS program review for CWS & NCWS.</p>	<p>R5 will conduct a PWS program review (formerly called data verification) in IL in late CY11. (scheduled for November 28 – December 1, 2011) -Review consists of CWS & NCWS -Region 5 will provide State Target List and Questions prior to review.</p>	
<p>16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.</p>	<p>Ongoing – will continue. Tracked in SDWIS/State</p>	<p>Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.</p>	
<p>16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.</p>	<p>Ongoing – will continue.</p>	<p>Assist with enforcement referrals, analysis, and data clean up or other joint efforts as requested by state.</p>	

<p>16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.</p>	<p>Ongoing – Illinois EPA will continue to provide timely updates to USEPA-Region 5 requests.</p>	<p>Each quarter, Region 5 will send the states updated ERP reports requesting a state update. Region 5 will integrate State updates into reports before the next request is sent out.</p>	
<p>16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.</p>	<p>The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.</p>		
<p>16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2011 and June 2012.</p>	<p>Illinois now has legislation making Compliance Commitment Agreements enforceable. At this time, the impact of this legislation will be difficult to assess. Hence, Illinois EPA will commit to address and resolve 80% of the systems over the reporting period.</p>	<p>► Region 5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.</p>	

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
<p>17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p>	<p>IDPH will commit to completing the locational data for the 145 Non-transient and Transient Non Community source water system facilities.</p> <p>For each data submission with errors, the State will contact the Region about their plans for fixing the errors.</p>	<p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	
<p>17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.</p>	<p>Ongoing – will continue.</p>		
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p>	<p>Since data management is critical to each State’s ability to maintain primacy, the State shall send a representative to the annual ASDWA Data Management Users conference.</p> <p>Note: Item 17.3g has been Completed and data will continue</p>	<p>Region 5 is continuing to develop compliance determination and violation reporting training (CDVRT). The LCR CDVRT module is nearly complete. In addition, we are trying to obtain funding to complete the remaining modules.</p>	

<p>17.3b – State will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3e – The State will work with the Region to test/evaluate the eDV tool.</p> <p>17.3f – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State’s plans or schedule to use them including the eDV tool.</p> <p>17.3g – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p>	<p>to be updated.</p>		
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Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
18.0 – Annual Compliance Report			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.	Illinois EPA will provide future reports by July 1 st of each calendar year.	OECA to provide annual ACR guidance. Region 5 will forward guidance when received.	
19.0 – Variances and Exemptions			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	This is not applicable to Illinois.		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals			
20.1 – Gather information to track strategic plan progress. State directors will attend the annual Region 5 state directors meeting in April 2012 and April 2013 to discuss primacy and implementation issues.	IEPA will report these measures through the PPA.	Compile information and report to HQ. Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public	

Table 1. Primacy Activities

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

Table 2. Other Activities

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

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
<p>2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.</p>	<p>Revise ERG workplan to reflect progress. Due Dates – September 30, 2011 and September 30, 2012</p> <p>Develop a fiscal plan as the ERG approaches the end of the budget period (December 31, 2012).</p>	<p>Coordinate information and issues on Op Cert Program implementation and annual reports as well as ERG progress.</p> <p>The ERG funds are to be expended within the existing grant end dates, and to help Region 5 states expend these funds within this timeframe, Region 5 staff will share information about successful state efforts to use ERG funds.</p>	
<p>2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators and (2) provide training and opportunities for upgrading and renewing certification for existing operators.</p>	<p>Ongoing – will continue.</p>		

<p>2.3 – Provide supplemental certification and training to water system operators on relevant topics from section 7.0 “Sustainable Infrastructure” of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.</p>	<p>Will coordinate with USEPA-Region 5 on this activity.</p>	<p>Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.</p>	
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Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.</p>	<p>IEPA will provide future reports by December 31 of each calendar year.</p>	<p>Region 5 will send a reminder to the State about the capacity development annual report in August 2011 and August 2012.</p>	
<p>3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.</p>	<p>IEPA will provide future reports to the governor as appropriate (next submittal is due by October 1, 2011).</p>	<p>Region 5 will send a reminder to the State about the report to the governor in August 2011.</p>	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
3.3 – Promote “Sustainable Infrastructure” activities as described in section 7.0 of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.	Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with states.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.1 – Update source water assessments, as resources allow.			

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).</p>	<p>SWP plan development and implementation will be achieved with assistance from the following SWC partners:</p> <p>Illinois EPA will continue to work with the IRWA and local stakeholder to encourage regulatory and non-regulatory protection programs.</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance.</p> <p>Encourage interstate communication through conference calls and an annual State-R5 EPA meeting.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012 on June 30, 2012 by August 15, 2012.</p>	<p>Groundwater Section staff are updating source water assessments and will evaluate the most efficient mechanism to report program measures to the USEPA-Region 5.</p>	<p>Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.</p>	

Table 2. Other Activities

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

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	Ongoing – will continue.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – DWSRF			
5.1 – Implement all required activities.	Ongoing – will continue.	Review IUP and set-aside workplans. Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.	

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report			
6.1 – Review the draft report prepared by Region 5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.	Illinois EPA will continue to coordinate with USEPA Region 5.	Use the logic model to improve our ability to understand measure, assess, and communicate progress. SPM will work with state program to determine state-specific approach, and schedule.	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – Sustainable Infrastructure			
<p>7.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.</p>	<p>Illinois is piloting a small systems compliance grant program. This program is designed to provide financial capacity by awarding \$2 million in up to \$200,000 increments to several very small community water supplies. This grant program is being funded through DWSRF loan repayments. Upon culmination of this program, the effort will be evaluated for future use.</p>	<p>Participates in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>► Region 5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Environmental Justice			
8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.	Ongoing – will continue.	Region 5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools as an interim screening approach.	
OW ACS code	Goal 2: Clean and Safe Water Subjective 2.1.1: Water Safe to Drink		
SDW-03	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. This is an indicator that HQ reports.		
SDW-04	In FY2012, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). HQ reports.		
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). HQ reports.		
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. This is an indicator that HQ reports.		
SDW-12	Percent of DWSRF dollars awarded to small PWSs serving <500, 501-3,300, 3,301-10,000 consumers. This is an indicator that HQ reports.		
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. This is an indicator that HQ reports.		
SDW-14	Number and percent of CWSs and NTNCWSs, including new PWSs, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). This is an indicator that HQ reports.		
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. This is an indicator that HQ reports.		
SDW-16	Average time for small PWSs (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). This is an indicator that HQ reports.		
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. This is an indicator that HQ reports.		

OECA ACS code	Goal 5: Compliance and Environmental Stewardship Subobjective 5.1.2: Address Environmental Problems from Water Pollution
5.1.2 (SDWA02)	During FY2012, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2011 ETT report.
Measure	America's Children and the Environment, Third Edition (ACE3) Drinking Water Contaminants
E6	Percentage of children served by CWSs that did not meet all applicable health-based drinking water standards. This is an indicator that HQ reports.
E7	Percentage of children living in areas served by CWSs with violations of drinking water monitoring and reporting requirements. This is an indicator that HQ reports.

